

Final Environmental Assessment and Finding of No Significant Impact

Laupāhoehoe Forest Management Plan

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Hawai‘i Department of Land and Natural Resources
Division of Forestry and Wildlife

USDA Forest Service
Pacific Southwest Research Station – Hilo
Institute of Pacific Islands Forestry

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Summary

Laupāhoehoe Forest (12,343 acres) is situated on the eastern, windward flanks of Mauna Kea in the North Hilo District on the island of Hawai‘i (TMK (3) 3-7-001:002, (3) 3-7-001:012). Laupāhoehoe Forest is composed of Laupāhoehoe Natural Area Reserve and the Laupāhoehoe section of the Hilo Forest Reserve and also is federally designated as part of the Hawai‘i Experimental Tropical Forest. Laupāhoehoe Forest is important watershed and valuable native habitat for many species of rare plants and animals. The Laupāhoehoe Forest Management Plan proposes management actions to be implemented over the next 15 years to support long-term protection of the native forest and watershed. In addition to continuing existing management (e.g., invasive species control, rare plant restoration, research, etc.), the Management Plan also proposes the creation of new fenced conservation units (approximately 2,659 total acres), the maintenance and development of identified primitive trails within the Forest and the establishment of primitive camping at Shack Camp; increased opportunities for education and outreach visits; and the installation of management shelters and helicopter landing zones to support natural resources management, wildfire suppression, and emergency response. Best management practices and mitigation measures would be incorporated to minimize negative impacts to water, botanical, faunal, or archaeological resources. The creation of conservation units will decrease the acreage available for public hunting in Units C and K by approximately 2,659 acres; locations for proposed fencing were selected to protect intact forest and to minimize impact on hunting.

Section 1. Introduction and Background

Introduction

The 12,343 acre (ac) (5,134 hectare (ha)) Laupāhoehoe Forest area consists of two state-managed parcels of land on the eastern windward flanks of Mauna Kea in the North Hilo District on the island of Hawai‘i (Figure 1). Both parcels are managed by the Hawai‘i Department of Land and Natural Resources (DLNR) Division of Forestry and Wildlife (DOFAW): 4,449 acres as Forest Reserve (FR) and 7,894 acres as Natural Area Reserve (NAR). In addition, the Laupāhoehoe Forest is designated as part of the Hawai‘i Experimental Tropical Forest (HETF).

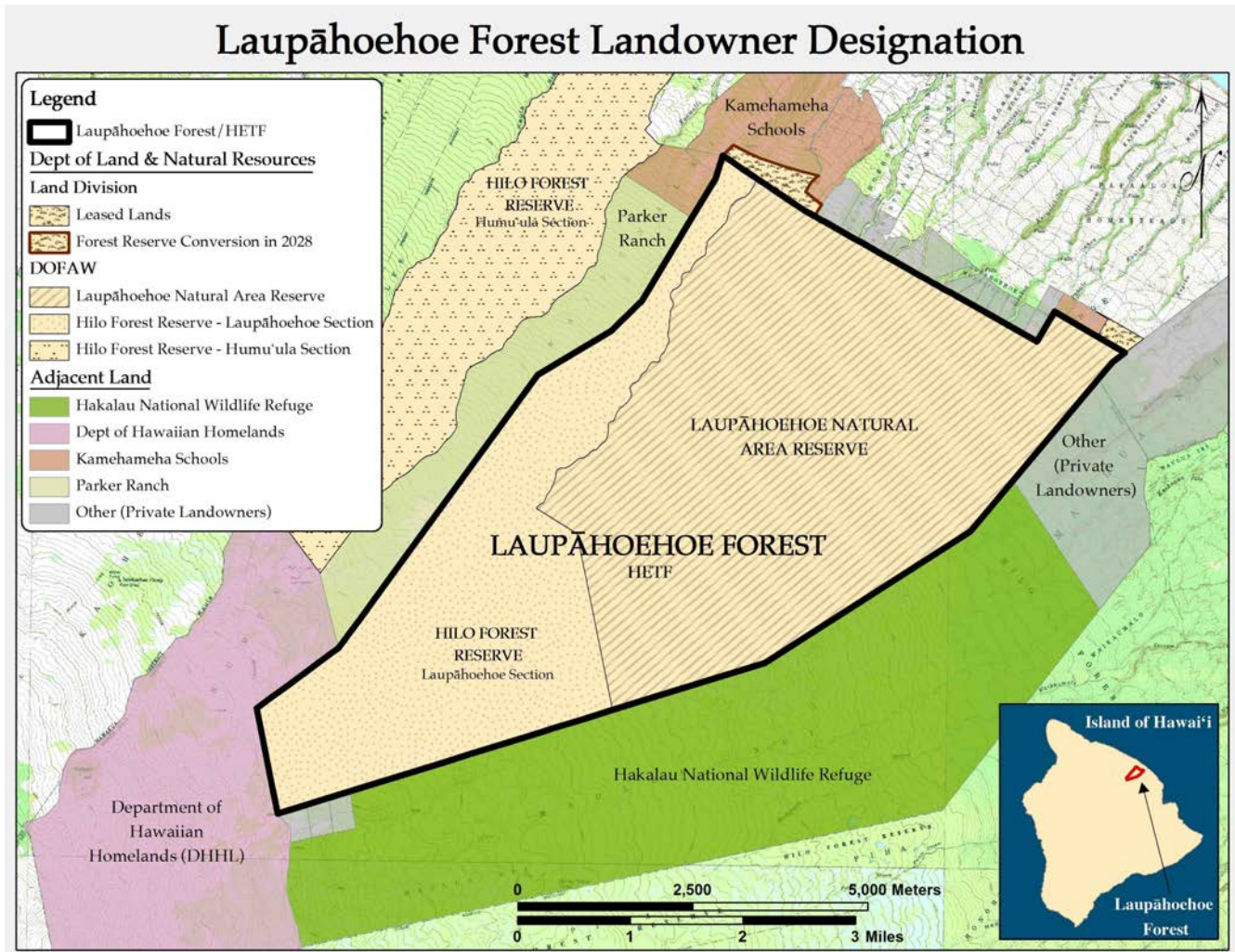


Figure 1. Laupāhoehoe Forest Landowner Designation

In 1992, the Hawai'i Tropical Forest Recovery Act authorized the establishment of the HETF to serve as a center for long-term research and a focal point for developing and transferring knowledge and expertise for the management of tropical forests. In 2007, the HETF was formally established. The HETF consists of two units, one of which is the Laupāhoehoe Wet Forest Unit located on the windward side of Hawai'i Island; the other is the Pu'u Wa'awa'a Dry Forest Unit located on the leeward side of Hawai'i Island.

The United States Forest Service (USFS), Pacific Southwest (PSW) Research Station's Institute of Pacific Islands Forestry (IPIF), based in Hilo, works cooperatively with the state of Hawai'i to coordinate research, management, and educational activities and to jointly develop and implement research and education and management plans for the experimental forest. Land management and protection responsibilities remain with DLNR-DOFAW and these lands are managed under relevant

state laws and regulations.

The Laupāhoehoe Forest contains native-dominated forested landscapes from lowland forest at 1,700 ft (700 m) extending through four life zones to almost 6,200 ft (1,890 m) in elevation, supports magnificent examples of tropical rain forest, and provides habitat for numerous endangered plant and animal species. The Management Plan for the Laupāhoehoe Forest (Appendix E) is based on the overall vision for the area as part of the HETF, as State NAR, and as State FR, and proposes actions to maintain the integrity of the existing forest as watershed, forest, and native habitat. The plan incorporates the values and interests of community members and stakeholder groups and attempts to balance the need for increased forest protection and management with the desire for enhanced human use.

Purpose and Need for Action

Laupāhoehoe Forest has long been recognized for its value as watershed and native habitat. The Laupāhoehoe section of Hilo FR (12,343 ac) was established in 1905 for the purpose of watershed protection. A portion of the FR was re-designated as Laupāhoehoe Natural Area Reserve (7,894 ac) in 1983 to protect unique natural resources, specifically the wet forests of koa (*Acacia koa*) and 'ōhi'a (*Metrosideros polymorpha*), wet grasslands and streams, and the associated rare species found within this area. In 2007, Laupāhoehoe Forest was selected to be part of the HETF (in combination with dry forest in Pu'u Wa'awa'a) to foster research and learning about Hawai'i's tropical forests. The Laupāhoehoe Forest ranked amongst the highest of the potential wet forest sites for all criteria considered (suitable size; encompass broad environmental gradients; land use history variation; access and proximity; potential to conduct long-term research projects; contain sites suitable to address many pressing land management needs).

There are many existing threats to the integrity of Laupāhoehoe Forest (detailed below) requiring management attention, while forest management is perennially underfunded in Hawai'i. Hawai'i ranks near the bottom (48th) in the nation for state spending on fisheries and wildlife, though the state forest reserve system ranks 11th in size (DLNR 2015). A conservative estimate of the amount of state funds dedicated solely to conservation of native wildlife and their habitats, statewide (including inland and marine waters), was approximately \$35 million for Fiscal Year 2015 (DLNR 2015).

Invasive non-native plants and animals constitute a severe threat to the native ecosystems and watershed resources in Laupāhoehoe Forest. Invasive plants can encourage fire by increasing the amount of available fuels or decreasing water input to streams and ground water. Invasive non-native plants can displace distinctive native flora, resulting in a loss of species diversity and eventually in changes to ecosystem function such as nutrient cycling. Many invasive non-native plants completely

replace native vegetation by preventing any regeneration of native species or by direct replacement of native trees, resulting in total loss of native habitats and negatively affecting native birds and invertebrates (Cuddihy and Stone 1990). The upper forested areas between 3,500 – 6,500 ft (1067 – 1981 m) elevation contain relatively low densities of invasive non-native plants. However, below 3,500 ft (1067 m), forests become heavily invaded by strawberry guava (*Psidium guava*), clidemia or Koster's curse (*Clidemia hirta*), yellow Himalayan raspberry (*Rubus ellipticus*), and Himalayan or kahili ginger (*Hedychium gardnerianum*). Above 4,500 ft (1372 m), forests are invaded in some areas by grasses, banana poka (*Passiflora tarminiana*), and tropical ash (*Fraxinus uhdei*). Other high-priority invasive non-native plants currently present in Laupāhoehoe Forest include Australian tree fern (*Sphaeropteris cooperi*), *Ficus* spp., Florida blackberry (*Rubus argutus*), cane tibouchina (*Tibouchina herbacea*), mules foot fern (*Angiopteris evecta*), palm grass (*Setaria palmifolia*), passionfruit (*Passiflora edulis*), *Polygonum chinensis*, and German ivy (*Delairea odorata*).

There are additional invasive non-native plant species of serious concern present in adjoining areas, but not yet detected in Laupāhoehoe Forest: miconia (*Miconia calvenscens*), faya (*Morella faya*), gorse (*Ulex europaeus*), firethorn (*Pyrocantha angustifolia*), *Cotoneaster pannosus*, and New Zealand flax (*Phormium tenax*).

Feral ungulates (hooved animals) pose a threat to native ecosystems, species, and watersheds because they eat and trample native plants (Cooray and Mueller-Dombois 1981) and disperse the seed of invasive non-native plants. The primary ungulate in Laupāhoehoe Forest is the feral pig (*Sus scrofa*), which is found throughout the forest except in the existing small fenced areas (35 total acres). The rooting and wallowing behavior of pigs can increase the inputs of pollutants to streams (i.e., animal waste) and stream water turbidity due to soil erosion (Stone 1985, Bruland et al. 2010), and wallows can result in breeding areas for disease carrying mosquitoes (Baker 1979, USGS 2005, USGS 2006). Pigs also eat some invasive plant fruits, such as strawberry guava, which they can transport and then defecate in new areas (Aplet et al. 1991). In addition, feral pigs have been shown to spread root-rot fungi (Baker 1979) and can carry parasites and diseases transmittable to humans and dogs, such as leptospirosis (Warner 1956-1969, Sasaki et al. 1993) and tuberculosis (Giffin 1978). All feral cattle (*Bos taurus*) were removed from the area by 2003; however they remain a potential future threat as they are still present in adjoining areas (Waipunalei and Humu'ula) and occasionally get into the forest.

Introduced diseases and pathogens threaten native animals and plants, and given the lack of biosecurity in Hawai'i, the introduction of new diseases and pathogens is highly likely. For example, rapid 'ōhi'a death, a newly identified disease killing thousands of acres of 'ōhi'a in forests and residential areas of the Puna and Hilo Districts, has emerged as a critical threat facing native ecosystems since the Draft Management Plan was developed. Climate change may affect the Laupāhoehoe Forest by altering

rainfall patterns and amounts, which may then impact forest composition, growth and structure (Iwashita et al. 2013). Rare ecosystems and species may be negatively affected by relatively rapid changes in precipitation, temperature and humidity that result from a rapid and drastic change in regional or local climate patterns (e.g., prolonged drought, higher temperatures). Detrimental invasive species may change their distribution and abundance due to changes in the climate (e.g., mosquitoes may be more frequently found at higher elevations due to warming temperatures). Although natural disturbances such as hurricanes, droughts, and flooding are regular occurrences in Hawai‘i, widespread insect-driven defoliation can also impact the forest (koa moth (*Scotorythra paludicola*)), and ‘ōhi‘a undergoes periodic declines where entire stands of ‘ōhi‘a die off at the same time (Akashi and Mueller-Dombois 1995, Anderson et al. 2001, Mueller-Dombois 1980). These types of natural disturbances may increase as a result of climate change.

Illegal human activity occurs on a small scale, primarily in the form of illegal camping, off-road all-terrain vehicle use, dumping, unpermitted harvesting (koa, maile (*Alyxia oliviformis*), hāpu‘u (*Cibotium* spp.), and other native trees and plants), poaching, marijuana cultivation, and vandalizing signs and fences. These activities destroy infrastructure and native species, and some illegal activities create openings in the forest that can be invaded by invasive non-native plants.

Fire poses a threat to Laupāhoehoe Forest, particularly in the drier upper elevation during times of drought and in areas adjacent to human activity. Hawai‘i’s flora evolved with infrequent, naturally occurring fires, so most native species are not fire adapted and are unable to recover quickly after wildfires. Wildfires leave the landscape bare and vulnerable to erosion and non-native weed invasions (D’Antonio et al. 2000, Dunkell et al. 2011, Smith and Tunison 1992). Continued feral ungulate damage to native ecosystems can convert native forest to non-native grasses and shrubs, which provide more fuel for fire (Ainsworth and Kauffman 2010, Cabin et al. 2000, Chynoweth et al. 2013, Cole et al. 2012, Nogueira-Filho et al. 2009, Scowcroft and Giffin 1983, Thaxton et al. 2010). Invasive non-native plants, particularly grasses, are often more fire-adapted than native species and will quickly exploit suitable habitat after a fire (D’Antonio et al. 2000, Mack and D’Antonio 1998). The principal human caused ignition threats are from catalytic converters and other hot surfaces of vehicles or heavy equipment and illegal campfires; the principal natural ignition source is lightning.

The purpose of developing the Management Plan is to outline a 15-year management plan to address the threats to the Laupāhoehoe Forest as a unit. Specifically, it provides:

- guidance and recommendations to DLNR-DOFAW and USFS from stakeholders including the Laupāhoehoe Advisory Council (LAC);
- prioritized recommendations on how to preserve and protect the area, as well as continue and

enhance human use;

- a compilation of natural and cultural history, resources, and research;
- documentation of current forest conditions and threats;
- a planning and management tool for DLNR-DOFAW and the USFS to use to determine priorities, work plans, staffing requirements, budget requests, and more; and
- funding guidance and a document that enables DLNR-DOFAW and USFS to ask for the resources necessary to protect Laupāhoehoe Forest.

The Laupāhoehoe Forest Management Plan is based on the overall vision for the area as part of the HETF as an important research, education and demonstration forest, as well as the purpose of the State land designations as NAR and FR. Maintaining the integrity of the existing forest and the health and abundance of the native species is critical to the vision.

The Management Plan identifies five primary objectives as follows:

- Natural Resources – Protect, manage and restore native ecosystems and species;
- Research – Provide lands for conducting research that serves as a basis for the restoration, conservation, and management of tropical forest ecosystems;
- Education and Outreach – Serve as a center for forest education, training, demonstration, and outreach on tropical forests, conservation biology, and natural resource management for groups ranging from school children to land managers, scientists, and the general public;
- Public Access and Recreation – Improve appropriate public access and recreational opportunities consistent with maintaining native natural resources, cultural resources, and the wilderness character of these lands; and
- Infrastructure – Provide and maintain infrastructure and facilities to maintain forest goals.

Legal and Policy Guidance

The following Federal, State, and county laws or policies were considered in the development of the Management Plan and this EA.

Hawai‘i Revised Statutes (HRS) Chapter 195: This chapter establishes the Hawai‘i Natural Area Reserves System (NARS) to “preserve in perpetuity specific land and water areas, which support communities, as relatively unmodified as possible of the natural flora and fauna, as well as geological

sites, of Hawai‘i” (HRS § 195-1).

HRS Chapter 183: This chapter establishes the state Forest Reserve System, for the preservation, protection, regulation, extension and utilization of forest resources and the protection of the springs, streams, and sources of water supply within the forests (HRS §§ 183-1.5, 183-2).

HRS Chapter 183C: This chapter recognizes “that lands within the state land use conservation district contain important natural resources essential to the preservation of the State's fragile natural ecosystems and the sustainability of the State's water supply” and identifies that these lands should be conserved, protected, and preserved “through appropriate management and use to promote their long-term sustainability and the public health, safety, and welfare” (HRS §183C-1).

Endangered Species Act of 1973 (ESA): The purpose of the ESA is protection and recovery of imperiled species and the ecosystems upon which they depend. Under provisions of the ESA, Federal agencies are directed to seek to conserve endangered and threatened species and to ensure that actions authorized, funded, or carried out by the agencies are not likely to jeopardize the continued existence of any threatened or endangered species, or result in the destruction or adverse modification of designated critical habitats of such species.

Migratory Bird Treaty Act (MBTA) of 1918 as implemented subject to Executive Order 13186: The MBTA established an international framework for the protection and conservation of migratory birds. This act makes it illegal, unless permitted by regulations, to “pursue, hunt, take, capture, purchase, deliver for shipment, ship, cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird”.

Federal Noxious Weed Act of 1975: This law provides for the control and management of non-native weeds that injure or have the potential to injure the interests of agriculture and commerce, wildlife resources, or the public health.

Cooperative Forestry Assistance Act: This law authorizes the Secretary of Agriculture to cooperate on forest management issues with non-Federal forest lands.

Federal Farmland Protection Policy Act (FPPA): The FPPA is intended to minimize the impact Federal agencies or Federal programs have on the irreversible conversion of farmland to nonagricultural uses. Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland to non-agricultural uses work with NRCS to establish a farmland conversion impact rating score on proposed sites, to be used as an indicator of when the potential adverse impacts on the farmland exceed allowable levels.

Executive Order 13112: This Executive Order requires Federal agencies to prevent the introduction of

invasive species and provide for their control and to minimize the economic, ecological, and human health impacts that invasive species cause.

HRS Chapter 344: HRS § 344-4 provides for the protection of endangered species of indigenous plants and animals and for the introduction of new plants or animals only upon assurance of negligible ecological hazards and encourages the planting of native vegetation. Any activities proposed must analyze and evaluate effects to endangered species, their critical habitat, and native vegetation.

Hawai‘i Administrative Rules (HAR) Chapter 13-124: Indigenous Wildlife, Endangered and Threatened Wildlife, and Introduced Wild Birds: These regulations provide DLNR-DOFAW direction to conserve, manage, protect and enhance indigenous wildlife and manage exotic birds.

HAR Chapters 13-121, 122, and 123: Rules Regulating Hunting, Game Bird Hunting, Game Mammal Hunting: These rules provide general regulations regarding hunting in Hawai‘i and specify hunting units, seasons, bag limits and hunting methods for game birds and game mammals.

HAR Chapters 11-54 and 11-55: Any project and its potential impacts to State waters must meet the following criteria: (a) Anti-degradation policy (HAR § 11-54-1.1) which requires that existing uses and the level of water quality necessary to protect existing uses of the receiving State water be maintained and protected; (b) Designated uses (HAR § 11-54-3) as determined by the classification of the receiving State waters, and (c) Water quality criteria (HAR §§ 11-54-4 – 11-54-8). It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters.

National Historic Preservation Act of 1966 (NHPA): This act provides for the preservation of significant historical features (buildings, objects and sites) through a grant-in-aid program to the States. Federal agencies are directed to take into account the effects of their actions on items or sites listed or eligible for listing in the National Register. The regulations of Section 106 of NHPA require Federal agencies to undergo a review process to determine whether the proposed action has the potential to affect cultural resources.

Native American Grave Protection and Repatriation Act (NAGPRA): This law provides a process for museums and Federal agencies to return certain Native American cultural items – human remains, funerary objects, sacred objects, or objects of cultural patrimony – to lineal descendants and culturally affiliated Indian tribes and Native Hawaiian organizations.

HRS Chapter 6E: HRS Chapter 6E affords protection to historic sites, including traditional cultural properties of on-going cultural significance. HRS § 6E-8 outlines the review process for proposed State projects that may affect historic property, aviation artifact, or burial sites, and provides that a proposed project shall not be commenced until SHPD has given its written concurrence.

HAR Chapter 13-275: Rules Governing Procedures for Historic Preservation Review for Governmental Projects Covered Under Sections 6E-7 and 6E-8. These rules outline the procedures for SHPD review of agency projects that may affect historic properties, aviation artifacts, or burial sites.

Hawai‘i Coastal Zone Management Act (HRS Chapter 205A): Hawai‘i's Coastal Zone Management Act outlines objectives, policies, laws, standards, and procedures to guide and regulate public and private uses in the coastal zone management area, which is defined to be the entire state of Hawai‘i.

Hawai‘i State Planning Act (HRS Chapter 226): This chapter sets forth “the Hawai‘i state plan that shall serve as a guide for the future long-range development of the State; identify the goals, objectives, policies, and priorities for the State; provide a basis for determining priorities and allocating limited resources, such as public funds, services, human resources, land, energy, water, and other resources; improve coordination of federal, state, and county plans, policies, programs, projects, and regulatory activities; and to establish a system for plan formulation and program coordination to provide for an integration of all major state, and county activities” (HRS § 226-1).

Hawai‘i County General Plan: The Hawai‘i County General Plan identifies goals, policies and standards for the protection of natural and scenic resources.

Relationship to Other Planning Efforts

The goals and objectives of existing state, regional, national, and ecosystem plans and/or assessments were considered in the development of the Management Plan and this EA. The Management Plan attempts to be consistent, as much as possible, with existing plans and assists in meeting their conservation goals and objectives. This section summarizes some of the key related planning efforts.

Table 1.1 Related State, Federal, and County Planning Documents

Planning Document	Comment
Hawai‘i Statewide Wildlife Action Plan (DLNR 2015), updating the Hawai‘i Comprehensive Wildlife Conservation Strategy (Mitchell et al. 2005)	Statewide strategy for the conservation of native wildlife and plants. Identifies species of greatest conservation need. Recognizes Laupāhoehoe Forest as an existing management area important for forest birds, ‘io, koloa maoli, terrestrial invertebrates, and rare plants and identifies future needs “increase active management; implement fencing, feral pig control, weed control, and monitoring to assess management effectiveness”.
The Rain Follows the Forest – A Plan to Replenish Hawai‘i's Source of Water (DLNR 2011)	Watershed initiative developed by DLNR in 2011 to ensure fresh water is available to the people of

Planning Document	Comment
	Hawai‘i in perpetuity by protecting the watershed forests, with a goal of doubling the amount of protected watershed areas in 10 years. Laupāhoehoe Forest is identified as a priority watershed area on the island of Hawai‘i.
DOFAW Statewide Assessment and Resource Strategy (SWARS) (DLNR 2010)	Statewide plan that identifies areas of greatest need and opportunity for forests in Hawai‘i and develops a long-term management strategy. Objectives include: 1.1 Identify and conserve high-priority forest ecosystems and landscapes; 2.2 Identify, manage and reduce threats to forest and ecosystem health; 3 Enhance public benefits from trees and forests; 3.1 Protect and enhance water quality and quantity; 3.5 Protect and enhance wildlife and fish habitat; 3.7 Manage and restore trees/forests to mitigate and adapt to global climate change.
Atlas of Hawaiian Watersheds and Their Aquatic Resources (Parham et al. 2008)	The on-line Atlas was created to provide an accounting of the information on watersheds, streams, and the animals that inhabit the streams, to make the data freely available and to create a continuously growing document that can easily be updated with new information.
Laupāhoehoe Natural Area Reserve Draft Management Plan (DLNR 1989)	Previous (1989) management plan for Laupāhoehoe NAR; identified priority management as protecting the forest from feral pigs, improving access for public hunting, and removing priority weed species from intact portions of natural communities.
Hawai‘i State Plan	The Hawai‘i State Plan establishes a set of themes, goals, and objectives that are meant to guide the State's long-term growth and development activities. More detailed discussion on the Consistency of the Laupāhoehoe Forest Management Plan with the State Plan is provided in Section 5.
Mauna Kea Watershed Alliance Management Plan (Stewart 2010)	The Mauna Kea Watershed Alliance includes major landowners and partners on Mauna Kea (including DOFAW and USFS) working

Planning Document	Comment
	collectively to address watershed management issues of common interest and concern on Mauna Kea. The management plan identifies 8 goals to implement the vision “to protect and enhance watershed ecosystems, biodiversity and resources through responsible management, while promoting economic sustainability and providing recreational, subsistence, educational, and research opportunities”.
USFWS Revised Recovery Plan for Hawaiian Forest Birds (USFWS 2006)	Identifies recovery actions for Hawaiian forest birds, including “protect and manage ecosystems for the benefit and recovery of native forest birds”.
USFWS Final Designation and Non-Designation of Critical Habitat for 46 Plant Species from the Island of Hawai‘i, HI (USFWS 2003)	Provides recommendations for habitat management for rare plants found within Laupāhoehoe Forest: <i>Cyrtandra giffardii</i> , <i>Cyanea platyphylla</i> , <i>Clermontia peleana</i> , <i>Clermontia pyrularia</i> , <i>Cyrtandra tintinnabula</i> , and <i>Phyllostegia warshaueri</i> .
USFWS Big Island II: Addendum to the Recovery Plan for the Big Island Plant Cluster (USFWS 1998a)	Describes recovery actions needed for endangered plants found within Laupāhoehoe Forest: <i>Cyanea platyphylla</i> , <i>Phyllostegia racemosa</i> , and <i>Phyllostegia warshaueri</i> .
USFWS Recovery Plan for the Hawaiian Hoary Bat (<i>Lasiurus cinereus semotus</i>) (USFWS 1998b)	Describes recovery actions needed for the Hawaiian hoary bat including protecting and managing current populations.
USFWS Recovery Plan for the Big Island Plant Cluster (USFWS 1996)	Describes recovery actions needed for <i>Clermontia lindseyana</i> , <i>Clermontia peleana</i> , <i>Cyrtandra giffardii</i> , and <i>Cyrtandra tintinnabula</i> .
Hawai‘i Tropical Forest Recovery Action Plan (Hawai‘i Tropical Forest Recovery Task Force 1994)	Plan to develop consensus actions needed to recover, manage, and enhance Hawai‘i's tropical forests; contributed to the establishment of the HETF in 2007.
Hāmākua Community Development Plan (under development)	County of Hawai‘i community-level plan http://www.hawaiicountycdp.info/hamakua-cdp Preliminary draft (September 2015) includes the objective to “protect and enhance natural and cultural resources”, including sub objectives to

Planning Document	Comment
	“expand the local system of preserves”, “protect mauka forests”, “preserve scenic areas and viewsheds”, “protect and enhance ecosystems and watersheds”, and “establish and manage public access and trails”.
County of Hawai‘i General Plan (County of Hawai‘i 2005)	General Plan for the island of Hawai‘i outlines several relevant goals and policies, particularly relating to historic sites and natural resources and shoreline, including 6.3 (e) “...Assure the protection and restoration of sites on other public lands through a joint effort with the State”; 8.2(c) “Protect and promote the prudent use of Hawaii’s unique, fragile, and significant environmental and natural resources”; 8.2(d) “Protect rare or endangered species and habitats native to Hawaii”; 8.3(b) “Encourage a program of collection and dissemination of basic data concerning natural resources”; 8.3(e) “Coordinate programs to protect natural resources with other government agencies”; 8.3(i) “Encourage an overall conservation ethic in the use of Hawaii’s resources by protecting, preserving, and conserving the critical and significant natural resources of the County of Hawaii”; 8.3(j) “Encourage the protection of watersheds, forest, brush, and grassland from destructive agents and uses”; 8.3(o) “Encourage the continued identification and inclusion of unique wildlife habitat areas of native Hawaiian flora and fauna within the Natural Area Reserve System”; 8.3(s) “Establish a system of pedestrian access trails to places of scenic, historic, cultural, natural, or recreational values”.

Environmental Assessment Process

This environmental assessment (EA) process is being conducted in accordance with HRS Chapter 343 and the National Environmental Policy Act (NEPA) as a use of State lands and an action within the State Conservation District and as a major Federal action that may affect the environment due to the involvement of the USFS in administering the HETF. Because the State of Hawai‘i (DLNR) is the

landowner of the two parcels comprising Laupāhoehoe Forest, DLNR is the lead agency for the preparation of the EA. After review of the public comment on the Draft EA, the Draft Management Plan was finalized and this Final EA prepared.

Required Permits and Approvals

The Laupāhoehoe Forest Management Plan will require approval of the NARS Commission and the Board of Land and Natural Resources (BLNR).¹ In addition, before implementation of the Management Plan, the following are anticipated or have been completed:

- Project review by the Hawai‘i Coastal Zone Management program to ensure consistency with Section 307(c) of the Federal Coastal Zone Management Act and its implementing regulations at CFR 15 § 930.33(b);
- Informal section 7 consultation with U.S. Fish and Wildlife Service (USFWS) and Determination of Not Likely to Adversely Affect (NLAA);
- Consultation with the DLNR-State Historic Preservation Division pursuant to HRS § 6E-8 and NHPA § 106, including consultation with Native Hawaiian organizations such as the Hawai‘i County Cultural Resources Commission as § 106 consulted parties; and
- Consultation with the DLNR-Office of Conservation and Coastal Lands regarding conservation district use permit requirements.

Public Involvement and Agency Coordination

A brief history of the public involvement and agency coordination process used to develop the Management Plan follows. The Laupāhoehoe Advisory Council (LAC) was formed in December 2010 to provide guidance and consultation to DOFAW and USFS on issues of management, research, and education in Laupāhoehoe Forest. DLNR-DOFAW and the USFS compiled resource information available for Laupāhoehoe Forest, reviewed current conditions and activities within the Forest, and developed draft management concepts. DLNR-DOFAW, USFS and the LAC then jointly developed a Draft Management Plan through a collaborative planning process. Eleven public meetings were held with the LAC between 2012 and 2014, developing and discussing different aspects of the draft management plan. The comments and suggestions made through this process helped further develop and refine the proposed management actions. The Draft Management Plan was released to the public in April 2015, announced on the HETF web page (<http://www.hetf.us/page/home/>) and on DOFAW's

¹ The NARS Commission approved the Draft Management Plan in concept at its regularly scheduled meeting in April 2015.

Laupāhoehoe NAR web page (<http://dlnr.hawaii.gov/ecosystems/nars/hawaii-island/laupahoehoe-2/>), and hard copies distributed to the Hilo and Laupāhoehoe public libraries. DOFAW Staff gave a presentation on the Draft Management Plan at the NARS Commission public meeting on April 27, 2015, and an informational poster session to introduce the Draft Management Plan to the public was held June 17, 2015 at the Laupāhoehoe Community Public Charter School.

In October 2015, DLNR-DOFAW mailed a pre-consultation letter regarding the Draft Management Plan to the individuals, governmental agencies, Native Hawaiian organizations, and other groups listed in Appendix A, inviting comments and feedback on the Plan to be used in developing the Draft EA. A public notice was also published in the Hāmākua Times November 2015 issue.

Eight letters or emails were received during pre-consultation from the State Department of Health – Environmental Planning Office, the State Department of Health – Clean Water Branch, Hawai‘i Office of State Planning, the State Department of Land and Natural Resources – Division of Aquatic Resources, the State Department of Transportation, the US Fish and Wildlife Service, Hawai‘i County Police Department, and the Hawai‘i County Cultural Resources Commission. Copies of the correspondence are included in Appendix B.

The Draft EA was published in the Environmental Notice on March 8, 2016, and a legal notice announcing the release of the Draft EA was published in the Hawai‘i Tribune Herald and the Sacramento Bee on March 8, 2016. A notice of availability was mailed to the individuals, government agencies, Native Hawaiian organizations, and other groups listed in Appendix A. Thirteen comments were received; the comments and agency response are reproduced in Appendix C. Overall, comments were supportive of the Management Plan and associated proposed management actions.

After the public review and comment period, the Draft Management Plan was finalized and is included as Appendix E. No major changes were made to the Management Plan; instead changes were made primarily for clarity or to reflect updated information. The following summarizes the changes made in finalizing the Management Plan:

- Cultural information was added (in textboxes throughout the Plan) to complement and add depth to the Plan narrative;
- Maps and text were updated to reflect Maulua Nui/Uweki Road as a legal access to Laupāhoehoe Forest;
- Text was updated to clarify the existence and current status of historic trails (Maulua and Waipunalei) within Laupāhoehoe Forest;
- Additional discussion was incorporated regarding gathering rights and the permitting process

for gathering within Laupāhoehoe Forest;

- Information summarizing the findings of the 2015 archaeological field inspections was added;
- Additional text was added to reflect the currently known information on rapid ‘ōhi‘a death;
- Clarified that staff will perform field surveys prior to on-the-ground implementation of proposed management activity to avoid any negative impacts to botanical, faunal, cultural, or historic resources as required by State and Federal law and recommended by community stakeholders;
- Clarified that proposed fencing will enclose three instead of two units (though total acreage proposed for fencing remains the same);
- Under “Forest Protection and Management,” elaborated on the proposed action of restoring forested ecosystems in areas that have been disturbed by identifying potential reforestation techniques (localized herbicide spraying to remove invasive pasture grasses and weeds), manual planting of native trees with hand tools, and light scarification to enhance natural regeneration);
- Under “Forest Protection and Management,” added a new proposed action for clarification to read: “Monitor forest health and manage threats (e.g., rapid ‘ōhi‘a death or other disease or insect pests), where possible, using best available methods for remote and environmentally sensitive areas. Cooperate with researchers on emerging threats to forest health to determine best management practices to reduce the spread and negative impacts of these threats to native forest ecosystems.”
- Under “Rare Species Restoration,” added language to clarify actions to benefit native forest birds;
- Under “Wildfire Prevention and Response,” added language to clarify that management actions will include clearing of fuel breaks and other similar fire pre-suppression activities to reduce fire potential and minimize fire severity;
- Under “Public Access and Recreation,” clarified language to reflect the current on-the-ground status of the historic Maulua Trail (e.g., that remnants not easily visible) and to reflect that potential land acquisitions would be from willing private landowners;
- Reorganized information on Cultural Resources to reflect additional information from the Cultural Impact Assessment prepared by Maly and Maly (2006) and the Draft EA and to clarify that a goal of the Management Plan is to protect the existing cultural and historic resources found within Laupāhoehoe Forest;

- Updated information regarding research and education activities, including the current (at time of publication) research permit application;
- Clarifications to the maps to reflect additional information,
- Addition of two new maps, one in the land use history section depicting ahupua‘a and one to depict documented historic properties;
- and miscellaneous clarifications to update the Management Plan to reflect information that was presented in the Draft EA.

Issues/Scope of Analysis

During the process of public involvement, agency coordination, and internal scoping, issues associated with management of Laupāhoehoe Forest were brought forward. An issue is a point of concern, debate or dispute with a proposed action based on some anticipated effect. Topics considered during development of the Management Plan include:

Natural resources. Where are the most important forested watershed and intact native ecosystem areas within Laupāhoehoe Forest? What are the known threats to these resources? What are past and current management actions and what additional actions are needed to effectively address threats? What priority species are found within Laupāhoehoe Forest? What is the condition of their current habitat and can the populations of and habitats for these species be protected or expanded? How can management be linked to research and monitoring to improve management effectiveness?

Research. What type of research is needed to help effectively manage Laupāhoehoe Forest? What existing research is underway and what areas of research should be promoted or emphasized in Laupāhoehoe Forest? What conditions are needed to ensure that research is compatible with the desired management?

Education and outreach. How can Laupāhoehoe Forest contribute to greater understanding of tropical forestry, conservation biology, and natural resource research and management? What areas should be the focus of education and outreach within Laupāhoehoe Forest? What opportunities exist for increased outreach, education or training?

Public access and recreation. What is the current level of public use? What types of management action are necessary to encourage or enhance public access?

Infrastructure. What facilities and infrastructure are needed to support natural resources management, research, education and outreach, and public access?

Major issues brought up during internal and external scoping and addressed in this EA include:

Issue: *The Management Plan may impact hunting practices. Fences proposed for the Laupāhoehoe Construction Project may directly affect the size of hunting areas and the quality of hunting activities.*

Issue: *The Management Plan does not protect enough designated critical habitat of endangered plants currently or historically found within Laupāhoehoe Forest, enough of the recovery habitat needed for endangered forest birds located in the upper elevation areas of Laupāhoehoe Forest, or enough of the Natural Area Reserve through fencing and ungulate removal.*

Issue: *Increased public access to the Laupāhoehoe Forest may impact adjacent landowners by increasing trespass, vandalism, etc.*

Issue: *Best management practices should be utilized during all phases of plan implementation to assure minimizing negative impacts to aquatic resources and stream habitat (due to erosion caused by stream bank alteration, improvements to infrastructure, fencing or trails, or surveys in proximity to streams).*

Issue: *The negative effects of storm water runoff originating from human land-based activities should be evaluated, including the potential impact to nearshore marine resources.*

Issue: *Any projects and its potential impacts to State waters must meet existing State water quality criteria.*

Issue: *The Management Plan should discuss permitting of research, and what types of research action are and are not allowed within Laupāhoehoe Forest.*

Issue: *The Management Plan should include discussion of the permit procedures for Native Hawaiian religious and customary gathering rights, include historic trails and features, identify planned archaeological surveys and/or historic preservation plans, and include any plans for the treatment and management of known historic properties.*

Documents Incorporated by Reference

Previous Environmental Assessments prepared for the Laupāhoehoe Forest, and associated specialists' reports, are incorporated into the document by reference. These reports are:

1. Final Environmental Assessment: Hawai'i Experimental Tropical Forest Laupāhoehoe Construction Project and associated specialists' reports (Watershed and Soils; Wildlife; Botanical Survey; Scenery; Cultural Resources Site Reconnaissance (2009 and 2010)) (available for public review at the office at PSW-Hilo, or on-line at <http://www.hetf.us/page/resources/>);

2. Hilo Paliku-Hilo of the Upright Cliffs: A Study of Cultural-Historical Resources of Lands in the Laupāhoehoe Forest Section, Ahupua‘a of the Waipunalei-Maui Region, North Hilo District, Island of Hawai‘i (available for public review at the office at PSW-Hilo, or on-line at <http://www.hetf.us/page/resources/>); and

3. Final Environmental Assessment Hilo Forest Reserve Reforestation Project (2006) (available on-line at http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Hawaii/2000s/2006-10-08-HA-FEA-HILO-FOREST-RESERVE-REFORESTATION.pdf).

Section 2. Alternatives

Alternatives Development

During development of the alternatives for the Management Plan, DLNR-DOFAW, USFS, and the LAC reviewed and considered a variety of resource, social, economic, and organizational aspects important for managing the HETF. These biological, physical, and socio-economic conditions are described more fully in Section 3 and the Management Plan.

Alternative 1: No Action Alternative (Current management)

Alternative 1 describes current management activities. This alternative assumes little to no change in current management programs and is the baseline from which to compare the other alternatives.

Natural Resources

To date, DOFAW staff has built small fenced exclosures to protect approximately 35 acres of native forest habitat and rare and endangered plant species from feral ungulates; three exclosures (Kilau Uka, Loulu, and Scowcroft) are each approximately 10 acres, and 10 unnamed exclosures are less than ¼ acre. These exclosures are also used for restoration of rare plants through outplanting (Figure 2).

DOFAW staff control priority non-native invasive plants within the exclosures, along roadsides, and in other priority areas. Staff spend approximately 30 person days per year working on weed control, with additional work scheduled in summer when Youth Conservation Corps (YCC) crews are available.

DOFAW staff work cooperatively with other organizations and agencies on rare plant recovery including the Hawai‘i State Plant Extinction Prevention Program (PEPP) and the Volcano Rare Plant Facility (VRPF) of the University of Hawai‘i. Management actions specific to rare plant recovery include rare plant surveys to locate wild individuals, protection of wild plants in fenced exclosures,

collection of propagation and genetic storage materials and reintroduction through outplanting in fenced, protected exclosures. PEPP is focused on preventing the extinction of taxa with fewer than 50 individuals in the wild.

DOFAW staff follow rare plant collection and reintroduction guidelines recommended by the Hawai'i Rare Plant Restoration Group. DOFAW staff tag and map the locations of all outplanted plants and monitor their survival and growth. Rare plants reintroduced into Laupāhoehoe Forest in fenced protected exclosures include: *Anoectochilus sandvicensis*, *Clermontia lindseyana*, *Clermontia pyrularia*, *Cyanea platyphylla*, *Joinvillea ascendens*, *Ochrosia haleakalae*, *Phyllostegia macrophyllus*, *Phyllostegia warshaueri*, *Stenogyne macrantha*, and *Trematolobelia grandifolia*.

Laupāhoehoe Forest Existing Infrastructure

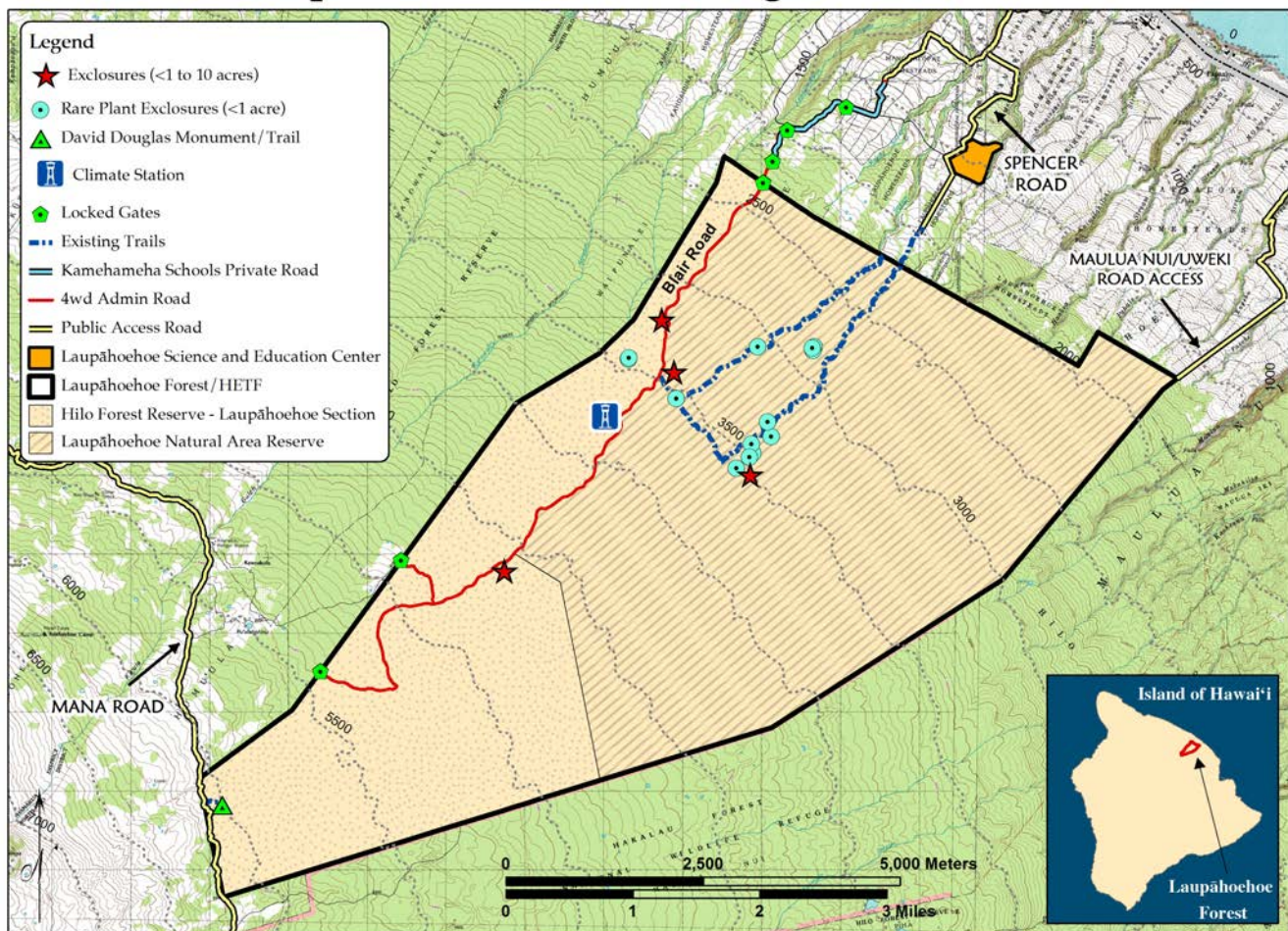


Figure 2. Laupāhoehoe Forest Existing Infrastructure

In 1982 a rare plant survey of the proposed NAR noted the presence or absence of certain priority

invasive non-native plants (Cuddihy et al. 1982). More intensive invasive non-native plant monitoring was completed across 9 transects in the NAR portion of the Laupāhoehoe Forest in 1988, to gather information for the 1989 management plan. These transects were re-monitored in 1998. In 2008, NAR staff monitored vegetation plots along new transects which included invasive non-native plant monitoring.

Forest birds in Laupāhoehoe Forest were surveyed as part of the Hawai'i Forest Bird Survey (Hāmākua Study Area) from 1976-1983 (Scott et al. 1986). These same transects were re-surveyed in 1993. In 2013, additional surveys were conducted to assess the status of forest birds as part of the development of the Management Plan.

Research

Research conducted in the Laupāhoehoe Forest is a combination of long-term monitoring of environmental conditions and biotic responses, and directed research to address key questions about forest ecosystem function, health, and sustainability. Research in the Laupāhoehoe Forest is conducted by universities, government agencies including the USFS, and private organizations. Projects vary in focus, scope and length. Research projects proposed for the Laupāhoehoe Forest are subject to permitting requirements, which include review by a committee composed of DOFAW and USFS representatives, standard conditions, and additional project-specific conditions as needed. Approval is granted for one year at a time, so that long-term projects have to re-apply to continue. The HETF Annual Reports, found at <http://www.hetf.us/page/resources/>, provide summaries of each year's research.

All approved research must submit an annual report on project progress and a close-out plan that details dates for the removal of equipment or any-related research infrastructure. Standard conditions on research projects include the following conditions: provide GPS coordinates of the study area (including site and plots); use of precautions and measures to minimize inconveniences to surrounding residents and the public in general; no disturbance of cattle or cattle ranching and shutting and re-locking of any closed gates encountered to and from the research site; minimize use of flagging and identification materials, avoidance of permanent markers (such as nails in trees) where possible, and no use of rebar; and use of appropriate protocols to minimize the potential for the introduction of non-native plants and animals.

In the Laupāhoehoe Forest, long-term monitoring infrastructure has been established for vegetation, climate, and stream monitoring. The Hawai'i Permanent Plot Network (HIPNET), a collaborative project between the University of Hawai'i (UH), the USFS, and University of California Los Angeles, has established a co-located vegetation plot and climate station in the Laupāhoehoe Forest that is part

of a worldwide study of tropical forests within the Smithsonian Tropical Research Institute's Center for Tropical Forest Science (www.ctfs.si.edu). Climate conditions in the forest are monitored by a weather station installed in 2009. The climate station extends 10 feet above the forest canopy and collects data on rainfall, temperature, relative humidity, wind-speed, solar radiation (sunlight), soil moisture, soil temperature, and wind direction. The Laupāhoehoe climate station is part of the EPSCoR-ENDER (Experimental Program to Stimulate Competitive Research – Environmental Dynamics and Ecosystem Responses) Climate Network, an island-wide network of climate stations at locations across the island of Hawai‘i. Research conducted in the HIPNET will enable advancement in the studies of global change, ecohyrdology, ecosystem services, remote sensing, restoration, community structure and organization, population genetics, comparative forest ecology and biogeochemical processes.

The Forest Inventory and Analysis Program (FIA) is a nationwide USFS program aimed at collecting, analyzing, and reporting information on the status and trends of America's forests. The Laupāhoehoe Forest includes 29 FIA plots (12 in the FR and 17 in the NAR) which represent a portion of the approximately 600-700 plots proposed for all of Hawai‘i. Hawai‘i's FIA program collects additional information on the presence of invasive plants and other disturbances such as feral pigs to provide a baseline assessment of the current state of forests all over Hawai‘i. Plots are scheduled to be re-measured every 10 years to provide insights into changes in forest extent, composition, structure, and disturbances.

One stream gauge has been established in Manowai‘ōpae Stream below the forest boundary for monitoring Laupāhoehoe Forest and the gauge is currently maintained by the USFS.

In addition to long-term data collection, the HETF supports a range of research projects that contribute to the greater ecological understanding of Hawai‘i's forests and species. Research topics include species identification, monitoring, ecosystem services and life history studies, koa productivity, biodiversity and invasive species impacts and control. Representative examples of the diversity of topics include:

- Hawaiian hoary bat habitat occupancy, reproduction and diet
- Acoustic variability and loss of song complexity in Hawaiian honeycreepers
- Adaptive radiation in Hawaiian spiders
- *Drosophila* bar coding project as a method to determine species
- Native and non-native snail surveys
- ‘Ōhi‘a rust monitoring

- Assessing the *Scotorythra paludicola* (Lepidoptera: Geometridae) outbreak on koa: population abundance, rates of parasitism and patterns of spread
- Comparative nutritive values of traditional and exotic foraging substrates for upper elevation forest birds
- Quantifying the effects of ungulate and vegetation on the hydrology of Hawaiian tropical forests
- Sources and fates of nutrients on a substrate age gradient across the Hawaiian archipelago and their consequences for forest dynamics.

Education and Outreach

Educational activities associated with Laupāhoehoe Forest currently include support for internships that focus on restoration and education (AmeriCorps, YCC, and Pacific Internship Programs for Exploring Sciences (PIPES)), and securing national, regional, and local grants that fund educational programs. Further, IPIF staff collaborations with teachers at local, middles and high schools have resulted in classroom field trips into the forest to learn about botany, ecology, natural resources management, traditional ecological knowledge and cultural geography. Many of the educational activities involve substantial contributions from additional partners including Mauna Kea Watershed Alliance, the USFWS, UH-Hilo, and UH-Mānoa.

Public Access and Recreation

Public access for recreational and cultural uses is ongoing in Laupāhoehoe Forest in accordance with existing rules and policies. Laupāhoehoe Forest is open to the public, but there are limited legal access points (via Spencer Road, Mana Road, and Maulua Nui/Uweki Road Access) and only a few minimally maintained and marked trails (see Figure 2).

Infrastructure

Existing infrastructure within Laupāhoehoe Forest consists of trails, a 4WD administrative-use road (Blair Road) used for management, research and educational purposes (but not public access), existing fenced units of 10 acres or less, and various research-related equipment (e.g., climate station, stream gauges, etc.).

Existing trails within Laupāhoehoe Forest include the following:

- Kaluakauka Trail – The trailhead for this Nā Ala Hele designated trail is on the makai side of the Keanakolu-Mana Road, 17.7 miles from the junction with Mauna Kea access road. The trail

goes downhill across forested pastureland to a foot gate in the FR boundary fence, then continues to the Dr. David Douglas monument erected in 1934 (approximate death site of Dr. David Douglas, the Scottish botanist for whom the Douglas Fir is named).

- Maulua Trail – A portion of this historic ranching era trail goes across the upper section of Laupāhoehoe Forest from the boundary near Shack Camp to Waipunalei. Access to this portion of the trail is via Blair Road. While small segments of the historic trail are visible, the trail is not currently maintained and most of the exact route of the historic trail is unknown due to weathering, erosion, and vegetation overgrowth.
- Laupāhoehoe-Waipunalei Trail – A portion of this historic trail is contained within the lower section of Laupāhoehoe Forest, generally following the boundary between Laupāhoehoe and Waipunalei ahupua‘a. Like Maulua Trail, the trail is not currently maintained and the exact route of the historic trail is unknown.
- Other trails – Additional named and unnamed trails can be found within Laupāhoehoe Forest. These trails are not formally recognized as public access trails and are not marked or maintained. Many of these primitive trails were created by the hunting community from the Spencer Road access point. Trail conditions are hazardous, steep and muddy, and lower elevation portions of the trail within the strawberry guava belt may frequently be “tunneled” in by guava tree windfall. “Peneki” and “Spencer” trails are two of these existing trails that have been identified for future management attention.

A facility, located outside the forest boundary, support education and research activities. The Laupāhoehoe Science and Learning Center was completed in 2015, consisting of a bunk house, toilet/showers, and meeting/classroom. The Center is located approximately 4 miles from the Forest boundary and can accommodate approximately 30 visitors for day-use and 15 visitors overnight.

Finally, “Shack Camp”, containing the ruins of a historic structure associated with Kūka‘iau Ranch and an opening in the forest due to past cattle grazing, is located at approximately 5,200 ft (1,585 m) elevation near the intersection of the Laupāhoehoe Forest boundary and the historic Maulua Trail.

Alternative 2: Implement the Management Plan

The chief distinction of this alternative from Alternative 1 is increased protection and management of

natural resources through the creation of new fenced conservation units (approximately 2,694 total acres); increased public recreational opportunities through trail improvement and creation and the establishment of primitive camping at Shack Camp; increased opportunities for education and outreach (such as field projects and workshops, field trips, professional development training, and increased communication of research findings); and the installation of management shelters and helicopter landing zones (in natural forest clearings) to support natural resources management, wildfire suppression, and emergency response. The Management Plan combines new proposed actions with ongoing research, management and education projects; proposed management is discussed in the context of five areas: natural resources, research, education and outreach, public access and recreation, and infrastructure.

Natural Resources

Four key areas of management are identified: Forest Protection and Management, Invasive Non-Native Plant Control, Rare Species Restoration, and Wildfire Prevention and Response.

Forest Protection and Management

Background: The protection and management of forested watersheds and unique native Hawaiian ecosystems is a priority for Laupāhoehoe Forest. Effective management of forested watersheds provides fresh water for public use, improves water quality, reduces soil erosion, improves coastal water quality, and maintains native ecosystems. In addition, many native, threatened and endangered species rely on forested watersheds for their survival. These forested watersheds require active management to effectively address threats in order to persist for the benefit of current and future generations and to maintain forest health. Protecting and enhancing the integrity of the native forest makes them more resistant and resilient to intermittent threats like fire, hurricane, extreme weather events, extended droughts, and insect or disease outbreaks and more likely to adapt to climate change perturbations.

Objective: Protect, manage and restore ecosystems and species at Laupāhoehoe Forest by effectively managing conservation units and implementing forest restoration practices.

Proposed actions:

1. Fence and remove feral pigs from conservation units (approximately 2,659 total ac) to protect the biological and water resources and limit damage to native Hawaiian ecosystems (Figure 3). Without fencing, damage from hooved animals cannot be stopped because of reproduction of existing populations and continued ingress from adjacent properties.

Laupāhoehoe Forest Habitat Protection and Management

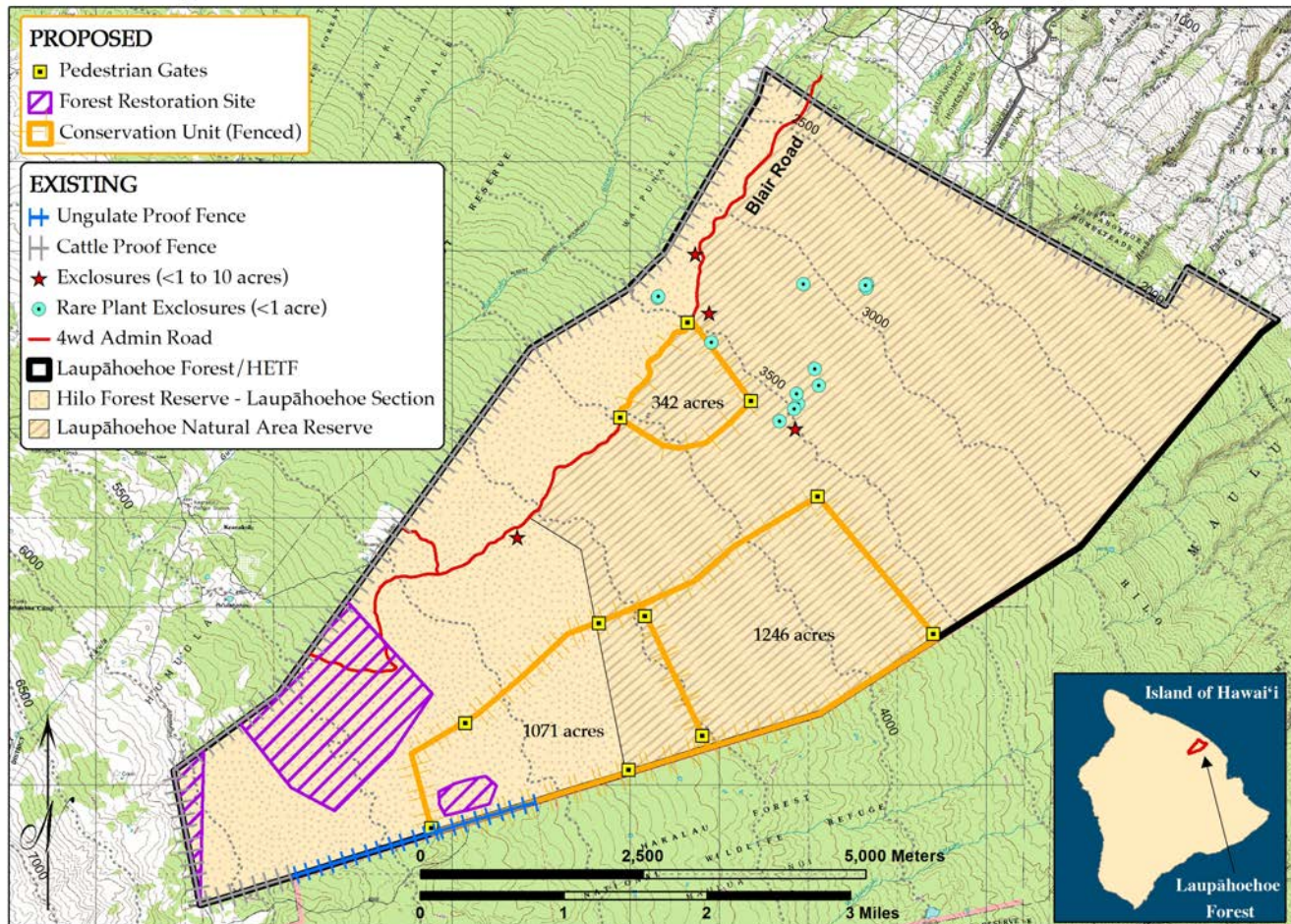


Figure 3. Laupāhoehoe Forest Habitat Protection and Management

2. Maintain all fences through regular inspection and maintenance and replace fences when needed, including perimeter fencing to prevent cattle ingress from adjacent ranch lands.
3. Restore forested ecosystems in areas that have been disturbed (e.g., formerly logged areas, areas disturbed by cattle) through native tree plantings. Priority areas include a) within the FR section along Mana Road and inward, b) Shack Camp, and c) section off Blair Road towards Waipunalei, but restoration is not limited to these areas. These priority areas were chosen because they have past damage from logging and feral cattle and limited natural regeneration and are accessible for staff and volunteers. Reforestation techniques include localized herbicide spraying in planting sites to remove invasive pasture grasses and weeds, manual planting of

native trees with hand tools by staff and volunteers, and light scarification to enhance natural regeneration of koa and/or other native species.

4. Control non-native pasture grasses and other non-native invasive weeds in restoration areas to enhance the natural regeneration of native trees and shrubs and prevent fire. Conduct thinning or removal of trees (excluding commercial logging) where needed to maintain forest health or reduce fuel loads.
5. Construct emergency rare plant exclosures between 1-5 ac in size when needed to protect individuals or populations of endangered plants.
6. Pursue potential land acquisitions of adjacent lands from willing partners for protection and restoration of a large conservation landscape in cooperation with conservation partners (when applicable).
7. Monitor forest health and manage threats (e.g., rapid 'ōhi'a death or other disease or insect pests) where possible, using best available methods for remote and environmentally sensitive areas. Cooperate with researchers on emerging threats to forest health to determine best management practices to reduce the spread and negative impacts of these threats to native forest ecosystems.

Invasive Non-Native Plant Control

Background: Invasive non-native plants are a major threat to Laupāhoehoe Forest, and species with high potential for spreading and modifying habitat are a high priority for control. The overall approach includes preventing the establishment of new habitat modifying species that are either not currently present (e.g., miconia) or are still localized through biosecurity measures. For priority weeds already present, the goal is to identify control areas, eliminate all known occurrences within targeted control areas, and/or contain further spread.

Objective: Protect intact native forest by preventing the establishment and/or removing high priority non-native, invasive plants and other invasive species.

Proposed actions:

1. Regularly monitor and map the distribution of high priority invasive non-native plants, develop a comprehensive control strategy and revised control strategy as needed based on monitoring data.
2. Control priority non-native invasive plants in identified areas using approved methods.
3. Monitor non-native invasive plants to determine whether weed control measures are effective

and to detect changes in long-term distribution and abundance.

4. Maintain procedures to prevent introduction of new weeds.

Rare Species Restoration

Background: Landscape-scale habitat protection and management through management actions described in the Forest Protection and Management section are critical to the long-term integrity and recovery of native ecosystems including rare plants, forest birds, and other native species. Such management actions, along with invasive non-native plant management control, are the most critical actions needed to protect existing native habitat and rare species. However, in some instances, these actions are not enough to recover certain rare and endangered plants and animals. These species may have additional threats and/or wild populations that are so small that the species cannot survive and recover without additional species-specific management.

Objective: Protect threatened and endangered plants and animals in Laupāhoehoe Forest and restore populations of these species in appropriate habitat to assist with the overall recovery of these species.

Proposed actions:

1. Maintain the integrity of high quality forest ecosystems to the extent possible through fencing, feral ungulate control, non-native invasive plant control and preventing the introduction and establishment of other habitat-modifying species and new threats.
2. Map, monitor and protect existing wild populations of rare and endangered plant and animal species to contribute to their population recovery and stabilization. Identify and remove threats to these species and ensure their long-term survival in secure and self-sustaining wild populations.
3. Re-introduce certain species of rare and endangered plants in appropriate protected habitat through outplanting. Over the past decade, numerous species of rare plants have been propagated and reintroduced into fenced, ungulate-free areas to contribute to their overall recovery in the wild.
4. Determine additional actions needed to protect rare invertebrates. Previously discussed habitat management will also benefit rare native invertebrates, as they are generally dependent on native plants for food and as host plants.
5. Enhance habitats and recovery of native forest birds and other native species through small mammalian predator removal and other habitat management actions, including removal of larval habitats and reducing or eliminating vespid wasps.

Monitoring

Background: DOFAW staff will continue to implement basic monitoring programs which are directly informing ongoing management. DOFAW staff regularly monitor ungulates, non-native invasive plants, rare plants and forest birds, and are planning to continue these monitoring programs. Additional monitoring is described under research and will primarily be implemented by USFS staff and other researchers.

Objective: Monitor current status and trends of natural resources throughout Laupāhoehoe Forest as part of a long-term monitoring program.

Proposed actions:

1. Continue ongoing monitoring programs for feral ungulates, non-native invasive plants and rare plants to measure the success of management and detect changes in abundance and distribution.
2. Continue ongoing monitoring program for forest birds and provide monitoring data to the Hawai'i Forest Bird Interagency Database Project for analysis of bird population densities and trends.
3. Develop improved monitoring protocols, data management and analysis for existing monitoring programs and review and summarize past monitoring data and inventories.
4. Develop and/or identify appropriate monitoring protocols and implement monitoring for key indicators and threats that are not currently being monitored (e.g., native vegetation communities, forest health, invertebrates, etc.).

Wildfire Prevention and Response

Background: Fire is a threat to the drier upper elevation portions of the Laupāhoehoe Forest. Many fires are caused by humans, so fire prevention measures will include increased educational efforts. It will also include clearing of fuel breaks and other similar fire pre-suppression actions to reduce fire potential and minimize fire severity. DOFAW staff will respond to fires in Laupāhoehoe Forest using measures that result in the least amount of impact or disturbance to natural and archaeological resources. The method of suppression will be determined by the on-site situation, with special regard to the potential expansion of fire damage to natural resource. Minimum impact methods of suppression will be applied whenever such methods are sufficient. Bulldozing is justified when a fire cannot be otherwise controlled and potential bulldozing damage is outweighed by a probably greater loss of natural and archaeological resources.

Objective: Employ appropriate fire management strategies including pre-suppression, suppression, and

post-suppression rehabilitation to reduce wildfire occurrence and minimize wildfire impacts.

Proposed actions:

1. Implement fire prevention measures, including educational outreach to neighbors and signage along roads and road or area closures in the event of extreme fire danger.
2. Control invasive plants, particularly non-native grasses and plant common native species to restore certain disturbed areas to prevent fire and/or following damage from fire.
3. DOFAW staff to suppress fires safely and aggressively using appropriate means to minimize wildfire impacts.
4. Continue DOFAW staff training and certifications for effective and safe fire response.
5. Maintain access and fuel breaks for fire pre-suppression and suppression.

Research

Background: The USFS and state of Hawai‘i, along with the consortium of institutions and agencies involved with the HETF, will continue to encourage and facilitate research in Laupāhoehoe Forest. Research projects that contribute to the greater purpose of the HETF, that are relevant to land management issues, and that are compatible with existing research and management will be encouraged. USFS will support facilities to enhance the ability of the experimental forest to meet its goals for research and science. In addition, the USFS will facilitate access to basic biological, physical, and climatological data for the experimental forest through readily accessible web-based platforms and tools for researchers and the public to provide a foundation on which research permits can be built. All research within the HETF requires a valid permit.

Objective: Provide lands for conducting research that serves as a basis for the restoration, conservation and management of tropical forest ecosystems in Hawai‘i and across the tropics.

Proposed Actions:

1. Promote applied research with direct relevance to land management issues such as effective management of invasive species, forest restoration, forest health, and climate change impacts on Laupāhoehoe Forest.
2. Effectively administer and coordinate the research application process including review of applications, issuance of research permits, research compliance with permit conditions and relevant land designation statutes and rules.
3. Establish and maintain a system for archiving research data and reports to facilitate the

exchange and transfer of information among agencies, scientists, and the community.

4. Improve dissemination of scientific research information and results to land managers and the local community.
5. Promote cultural research including information on traditional Hawaiian use/presence in the forest, oral histories, cultural impacts of management actions and archaeological studies.
6. Link ongoing research to education programs by encouraging researchers to work with local schools such as the Laupāhoehoe Community Public Charter School and universities.
7. Encourage basic research and monitoring to establish historical baselines of all natural resources.

Education and Outreach

Background: Education and outreach are key components of the overall vision for Laupāhoehoe Forest. Education and outreach goals span six focal areas: formal training for professionals; community outreach; cultural training; demonstration for natural resources managers; student research; and academic education. Educational goals will be accomplished through a strong reliance on partnerships and will be integrated with other aspects of research and natural resource management.

Objective: Serve as a center for forest education, training, demonstration and outreach on tropical forests, conservation biology, and natural resource management for groups ranging from school children to land managers, scientists, and the general public.

Proposed Actions:

1. Encourage appropriate educational and cultural uses of Laupāhoehoe Forest through the development of general criteria, priorities and rules to effectively manage multiple educational uses.
2. Provide general orientation and training (e.g., on-line videos) for all new research permittees and educational programs that includes recommendations on forest stewardship and invasive species prevention protocols as well as cultural components.
3. Collaborate with universities and relevant non-governmental organizations to integrate classes, student research/internships and provide support via Center facilities.
4. Foster and support undergraduate and graduate student research opportunities and research internships through partnerships with UH, other universities and local research agencies and organizations.

5. Provide a connection to nature and promote forest stewardship through engagement activities that involve the public and through collaboration with K-12 education program partners and other community partners including but not limited to the Laupāhoehoe Community Public Charter School. Educational activities include educator workshops and programs; field projects geared toward kids; partnering with schools, educators, community and other non-governmental organizations to create and implement activities that facilitate forest stewardship.
6. Communicate research findings, land use, and management goals to the community via community field trips, informational materials suitable for non-professionals of all ages, participation in community events, service learning opportunities, interpretive trails and guided walks, and public participation in scientific research.
7. Provide work experience and formal professional development training to land management professionals in ecology, conservation, and restoration of natural and cultural resources.
8. Serve as a demonstration site for land managers by providing information, tools and techniques through demonstration research, conservation and restoration projects.
9. Provide readily accessible scientific information through web-based platforms and tools.
10. Encourage researchers to share research results with the local community through informational presentations to schools and community groups and popular articles.
11. Hire staff and/or establish volunteer positions to facilitate educational and outreach experiences (e.g., education staff, rangers).
12. Serve as a site for alternative educational activities for non-profit groups and organizations (e.g., search and rescue training, orienteering, survival skills, back-country travel, hunter education programs, forest stewardship, Junior Youth Council, recreational and/or life skills, cultural immersion and traditional ecological knowledge training).

Public Access and Recreation

Background: Laupāhoehoe Forest is protected and managed by the state for the benefit of the people of Hawai‘i and is open to the public for various recreational and cultural uses. While the public is allowed to access and hike or hunt in any portion of the forest, there are limited legal access points and only a few minimally maintained and marked trails. This area is a rough and remote rainforest wilderness and there are currently no amenities for recreational users. The access and recreational improvements proposed are intended primarily for local residents and to improve staff management access rather than for large-scale ecotourism. Large groups (over ten people) accessing the NAR will continue to require a

HETF permit.

Objective: Improve public access and recreational opportunities in Laupāhoehoe Forest consistent with maintaining natural resources and the wilderness character of these lands.

Proposed Actions:

1. Improve public access through work with adjacent landowners for alternative access to the forest, work with the county to ensure all future subdivision plans in the area include public access to the forest, pursuit of potential land acquisitions from willing landowners to increase access, and consideration of adding trails and accesses (e.g., Maulua Trail) to the Nā Ala Hele Statewide Trails and Access System.
2. Trail maintenance (pedestrian) – Maintain existing trails (Spencer and Peneki) as primitive trails (minimally maintained and marked).
3. Trail improvement (pedestrian) – Improve existing and/or create and maintain new trails to the same level as the maintained trails mentioned above (Spencer and Peneki)(e.g., minimally maintained and marked). Identified trails include a new trail along the north fence line (upper boundary) from Mana Road to Blair Road; the improvement of Spencer trail to Peneki and Peneki to Blair; the establishment/marketing of the historic Maulua Trail along the approximate historic route; a new trail from Mana Road to Maulua roughly parallel to the southern forest boundary; and a new trail at the FR/NAR boundary. Specific alignments for trails have not yet been determined and may vary depending on the vegetation and terrain.
4. Hunting – Maintain and improve public hunting opportunities in Laupāhoehoe Forest, which would include securing and improving/creating access and trails as outlined above, facilitating additional hunter education classes in the Laupāhoehoe region, considering changes to the permitted hunting method for Unit C (currently rifle only) if desired by the hunting community, and working with DLNR-Division of Conservation and Resource Enforcement to address hunting community concerns about illegal activities at Laupāhoehoe Forest and elsewhere on the island.
5. Camping and Shelters – Establish designated camping area at Shack Camp with primitive camp sites, which could include the construction of a shelter or cabin at Shack Camp and related infrastructure such as composting toilet, fire pits, and a helicopter landing zone.

Infrastructure

Background: Infrastructure is needed to improve management, research and education and public

recreational uses in Laupāhoehoe Forest. Infrastructure includes roads, facilities, helicopter landing zones and structures, cabins/shelters and equipment.

Objective: Provide and maintain infrastructure and facilities to enhance the ability of the Laupāhoehoe Forest to meet its goals for management, research, education, and demonstration.

Proposed Actions:

1. Develop and maintain roads, cabins/shelters and campsites and helicopter landing zones for resources management actions, the functions of the HETF and for public recreational use and safety, specifically a) develop facilities at Shack Camp as outlined above, b) establish a forest management shelter and helicopter landing zone at 3,500 ft (1,066 m) elevation on the southeast side of the NAR for management (with the shelter also available for public use by reservation), c) establish approximately three other forest management shelters as needed to support natural resource management activities, at locations to be determined (with the shelters also available for public use by reservation), and d) establish additional helicopter landing zones to be used for management and search and rescue operations, in existing natural clearings within the Laupāhoehoe Forest boundary, at locations to be determined.
2. Ensure the development and maintenance of facilities and infrastructure has minimal impacts on the environment and natural and cultural resources.

Alternatives Considered but Dropped from Further Analysis

During development of the alternatives, DOFAW, USFS, and the LAC considered the actions related to the topics below. All of these actions were ultimately eliminated from further consideration for the reasons provided.

No Fencing/Fence entire Laupāhoehoe Forest: During Management Plan development, feedback relating to conservation units in Laupāhoehoe Forest ranged widely from support for fencing the entire forest for protection to opposition to any additional fences. The protection and management of forested watersheds and unique native Hawaiian ecosystems is a priority for the state within Laupāhoehoe Forest, and currently only 35 acres are protected from feral ungulates. Across Hawai‘i Island, state land managers face tough choices when tasked with protecting valuable native resources while still providing hunting opportunities. In particular with feral pigs, the negative impacts to the forest are well documented. The proposed conservation units identified in the Management Plan attempt to meet conservation needs while considering hunting community desires.

The size and locations for conservation units were chosen in consultation with the LAC and high use hunting areas were avoided where possible. The selected conservation units have some of the highest

quality, most intact native habitat in the Laupāhoehoe Forest, will protect existing populations of rare plants and animals, and can be used as restoration sites for rare species recovery.

Lower elevation areas (both in the NAR and FR) were not included, despite the historic records of endangered plants, because of the extent of the invasive weeds in this area that would increase the cost and reduce the effectiveness of future management. Known populations of existing endangered plants within the lower elevation area are already protected by small fenced exclosures, to protect the plants and allow for seed collection to support future reintroduction efforts within larger fenced units.

Pedestrian Access: Feedback ranged from current pedestrian opportunities are adequate, and no additional management actions are needed, to recommendations to consider the development of highly developed and maintained trails. A majority of comments recommended improving pedestrian access to allow a pedestrian to follow a recognized trail through the forest that would connect to Blair Road. Numerous options were considered during management plan development (including a trail from the top of Spencer Road to Blair Road). Due to the rugged terrain of Laupāhoehoe Forest, the heavy infestation of strawberry guava at lower elevations, and the financial resources needed to create and maintain trails (particularly in areas infested with non-native species), the Management Plan primarily focuses on improving existing primitive trails at lower elevations to allow pedestrians to traverse the forest and enter and exit at existing legal access points and provides for the development of new trails at higher elevation areas with more intact native forest.

Vehicular access to and within the forest: Feedback ranged from recommendations to dismantle Blair Road to opening Blair Road to public vehicular access. Blair Road is an important access for management, research and education/outreach opportunities in Laupāhoehoe Forest and for these reasons dismantling Blair Road was not considered as a feasible action. Opening Blair Road to public vehicular access was not considered feasible on either a permanent or sporadic (e.g., an “annual open house”) because Blair Road is only accessible through private land. In addition, negative impacts associated with increased public use of Blair Road (e.g., road maintenance considerations and the possible transport of invasive species) contributed to removing this option from further consideration. However, both USFS and DOFAW currently offer agency chaperoned service learning/outreach opportunities, and these types of activities are proposed for expansion in the Management Plan.

Mountain biking: Feedback ranged from mountain biking should not be allowed, to trails should be maintained/created to accommodate mountain biking. Biking is legal on FR roads, including Blair Road, but currently the only way to reach Blair Road on a bike is through private property, which is not legal. An alternative considered was the development of multi-use trails that would allow for legal entry; however, this was not selected for inclusion in the Management Plan because there were only a small number of trails proposed for pedestrian improvement, concerns about user conflicts, and bicycle

damage to trails.

Game enhancement: Feedback included a desire for the state to pursue game management to increase game mammal populations in the unfenced areas of Laupāhoehoe Forest primarily to allow for closures to create recovery periods coupled with DOCARE enforcement. Game management to increase game mammal populations for hunting conflicts with DOFAW management priorities for Laupāhoehoe Forest, as well as with federally designated critical habitat for endangered species. The proposed fenced conservation units in the Management Plan attempt to meet conservation needs while also considering hunting community desires. High quality habitat that is less heavily used for public hunting due to remoteness was purposely selected for the fenced conservation units. The Management Plan seeks to increase public hunting opportunities in more accessible areas outside the fenced conservation units through improvements in access, rather than using techniques (such as closures) to increase game mammals numbers.

Section 3. Environmental Setting and Consequences

Overview of Effects Analysis

This chapter assesses the potential effects to the physical and biological environment and to cultural and socio-economic resources as a result of implementing the Management Plan. The qualitative terms moderate (intermediate), minor, and negligible are used to describe the magnitude of the effect. To interpret these terms, intermediate is a higher magnitude than minor, which is of a higher magnitude than negligible.

The terms below were used to describe the scope, scale and intensity of effects.

Neutral or Negligible. Resources would not be affected (neutral effect), or the effects would be at or near the lowest level of detection (negligible effect). Resource conditions would not change or would be so slight that there would not be any measurable or perceptible consequence to a population, wildlife, or plant community, recreation opportunity, visitor experience, or cultural resource. If a resource is not discussed, impacts to that resource are assumed to be neutral.

Minor. Effects would be detectable but localized, small, and of little consequence to a population, wildlife or plant community, other natural resources; social and economic values, including recreational opportunity and visitor experience; or cultural resources. Mitigation, if needed to offset adverse effects, would be easily implemented and successful based on knowledge and experience.

Intermediate or Moderate. Effects would be readily detectable and localized with measurable consequences to a population, wildlife or plant community, or other natural resources; social and

economic values, including recreational opportunity and visitor experience; or cultural resources within Laupāhoehoe Forest but not readily detectable or measurable beyond Laupāhoehoe Forest. Mitigation measures would be needed to offset adverse effects and could be extensive, moderately complicated to implement, and probably successful based on knowledge and expertise.

Significant or Major. Region-wide effects would be obvious and would result in substantial consequences to a population, wildlife or plant community, or other natural resources; social and economic values, including recreational opportunity and visitor experience; or cultural resources. Extensive mitigating measures may be needed to offset adverse effects and would be large-scale in nature, possibly complicated to implement, and may not have a high probability of success. In some instances, major effects would include the irretrievable loss of the resource.

Time scales are defined as either short-term or long-term.

Short-term or temporary: An effect that generally will last less than a year or season.

Long-term: A change in a resource or its condition that will last longer than a single year or season.

Topography, Climate, Geology, and Soils

Existing Conditions

Laupāhoehoe Forest is located on the eastern, windward flanks of Mauna Kea from about 1,700 to 6,100 ft (518 – 1860 m) elevation. As the trade winds off the Pacific Ocean strike the mountain, moist air is elevated and cooled, resulting in cloudy weather, high rainfall rates, and afternoon fog and mist in the area. Condensation from ground-level clouds (fog drip) contributes additional moisture at higher elevations. Average annual rainfall in the lower elevations is about 160 inches (in) (418 centimeters (cm)) and ranges from 60 to 100 in (157 – 261 cm) in the upper elevations (USFS 2007).

Temperatures decrease with elevation. At sea level, the average monthly day time temperatures range from 79 to 82 °F (26-28 °C) and the night time temperatures range from 62 to 70 °F (17-21 °C). At highest elevations, the temperature could be more than 20 °F (13 °C) colder than in the lowlands.

There is a climate station (maintained by the USFS) at Laupāhoehoe Forest within the FR recording a variety of information including air temperature, relative humidity, solar radiation, soil moisture, and soil temperature.

Laupāhoehoe Forest is located on Mauna Kea, a dormant volcano and the second oldest volcano on the island. Substrate age ranges from 5,000 years before the present to 300,000 years before the present (Sherrod et al. 2007). The terrain and soils vary with the age and type of surface lava flows and the

depth of volcanic ash deposited over these flows. The terrain in the highest elevation areas is the youngest and the roughest. Surface flows in this area are grouped with the youngest of Mauna Kea's post-shield formation flow series and are characterized as predominantly 'a'ā or blocky 'a'ā flows which are generally free of the wind-blown volcanic ash deposits that cover the older Mauna Kea flows. These younger 'a'ā flows form a series of pronounced ridges that give the upper areas of Laupāhoehoe Forest a distinct ridge and swale topography. Soils on these flows are described as very stony loam (DLNR and USFS 2015).

In the upper mid-elevation of Laupāhoehoe Forest, the surface lava flows are older but are still grouped with those erupted during the younger post-shield phase of Mauna Kea's development. These flows are also predominantly 'a'ā or blocky 'a'ā flows but are partially mantled by volcanic ash deposits. Soils on these flows are described as silt loam formed from volcanic ash. These ash-derived soils are more weathered in the lower elevations where rainfall is slightly greater. Some areas can also be rocky where volcanic ash deposits are discontinuous (DLNR and USFS 2015).

Determination of Effects

No-Action Alternative

Implementation of the no-action alternative would keep existing soil conditions static. There would be extremely limited disturbance to soils attributable to invasive species removal, outplanting of rare plants, and ongoing research (e.g., installation of monitoring equipment such as stakes to mark out a grid, trampling of soils by researchers). Soil disturbance associated with ungulate (specifically feral pig) activity would be anticipated to continue throughout the Laupāhoehoe Forest (except within the existing 35 fenced acres), potentially contributing to increased soil erosion over time. A long slow decline of ecosystem function would be likely to continue. Some areas may remain pristine and unaffected for several decades, but the effects of feral ungulates, weeds, and predators would be expected to eventually severely compromise forest function.

Preferred Alternative

The impacts to soil resources associated with the additional actions proposed under full implementation of the Management Plan are as follows. Construction of conservation fencing involves hand clearing a corridor of vegetation along the alignment, minor ground disturbance within the alignment associated with fence post installation, and attaching high tensile woven wire mesh to the posts. Maintenance and development of new (primitive) trails involves removal of vegetation along the trail alignment as needed for single-file passage, estimated as approximately four to six feet horizontal clearance and seven to eight feet vertical clearance.

Development of primitive camping in the area of Shack Camp would likely involve the installation of a small open-sided shelter with roof catchment and fireplace/firepit, three to four self-contained composting toilets, delineation of up to ten sites for tent camping, installation of a management shelter that could also be utilized by the public by reservation, and identification of a helicopter landing zone to support maintenance of Shack Camp.

Maintenance and development of management shelters and helicopter landing zones would be sited in existing natural clearings within Laupāhoehoe Forest where possible, but may involve limited removal of shrubs and trees.

Soil disturbance would be limited in duration. No soils would be moved off-site, and no grading or grubbing would be involved. Best management practices would be incorporated to minimize impacts to soils and potential for erosion, including restricting vegetation clearing to the width necessary for fence construction or trail improvement, selecting fence and trail alignment to minimize the length of steep sections or the removal of trees, incorporating culverts and break-away fences where necessary (over streams or intermittent drainages) to allow water to pass through easily during heavy rain events, and siting Shack Camp facilities, management shelters and landing zones in open areas to minimize vegetation removal (DLNR 1996; Hawai'i Office of Planning 2010). A small section of ground (no greater than 400 square feet) at Shack Camp may be covered with concrete or gravel, for the open-sided shelter with fireplace/firepit, to reduce fire hazard.

After fence construction and associated ungulate removal, soil disturbance associated with ungulate activity within the fenced area would be anticipated to cease.

Conclusion

The effects of the additional actions proposed under the preferred alternative would be anticipated to have a minor, short-term negative effect on soils within Laupāhoehoe Forest and a minor, long-term positive effect by reducing soil disturbance associated with ungulate activity within 22% of the Forest.

Air Quality

Existing Conditions

Air pollution on the Big Island is mainly impacted from volcanic emissions of sulfur dioxide, which convert into particulate sulfate and produce a volcanic haze (vog) that persistently blankets the north and south Kona areas. Depending on wind directions, the Hilo area can also experience some vog conditions. The existing tradewinds in and near the Laupāhoehoe area provide excellent air movement. This, coupled with low density of population in the area, results in very good air quality.

Determination of Effects and Conclusion

No-Action Alternative

Implementation of the no-action alternative would keep existing air quality conditions static.

Preferred Alternative

There would be negligible air quality impacts associated with the additional actions proposed under full implementation of the Management Plan. Limited emissions associated with use of equipment such as chain saws to clear vegetation during fence construction, trail improvement, or invasive species control would not be expected to have any measurable direct or indirect effects on air quality and would not be expected to exceed State ambient air quality standards.

Noise

Existing Conditions

Noise levels within the Laupāhoehoe Forest are minimal. The only unnatural sounds discernible are caused by vehicles. All gates are locked and vehicular access is limited to State and Federal employees and individuals holding permits to conduct research or other activities in the HETF and landowners with right of entry agreements to access their privately owned parcels adjacent to the HETF.

Determination of Effects and Conclusion

No-Action Alternative

Implementation of the no-action alternative would keep existing noise conditions static.

Preferred Alternative

There would be negligible noise impacts associated with the additional actions proposed under full implementation of the Management Plan. Noise generated during fence construction, trail improvement, or some research or management activities that involve using equipment such as chain saws to clear vegetation may reach noise levels of 120 decibels, but would occur only during the day and be intermittent and localized. This noise would not impact private landowners nearby as proposed fences are not located adjacent to existing residential properties.

Water Resources

Existing Conditions

The Hilo FR (Laupāhoehoe section) was originally established in 1905 to protect the water supply of the district, and Laupāhoehoe Forest continues to provide important watershed services for the community. Native Hawaiians recognized the importance of forests in water production and water quality, as reflected in the Hawaiian proverb: “Haihai ka ua i ka ulu la au” (The rain follows after the forests). Early foresters also recognized the importance of Hawaiian forests as watersheds. Ralph Hosmer, the first Territorial Forester, stated “In Hawai‘i, the most valuable product of the forest is water, rather than wood” (DLNR and USFS 2015).

Laupāhoehoe Forest is an important source of fresh surface and ground water that supports downstream populations of humans and wildlife as well as supports healthy nearshore resources. Other watershed services provided by Laupāhoehoe Forest include: stream habitat for native waterbirds, fish and invertebrates; provision forest habitat for native plants, birds, and bats; flood control; mitigation of climate change impact; and economic, social, recreational and educational opportunities for the human communities in the area.

Numerous streams are found in the Laupāhoehoe forest, including Ka‘awali‘i Stream, Laupāhoehoe Stream, Kīlau Stream, Kaiwilahilahi Stream, Ha‘akoa Stream, and Pāhale Stream. The Atlas of Hawaiian Watersheds and Aquatic Resources (Parham et al. 2008) notes all these streams as perennial. However, the upper portions of these streams within Laupāhoehoe Forest are often intermittent. While the lack of surface water in these upper reaches makes it appear some of these streams within the forest may not necessarily be flowing year-round, subsurface groundwater flows from the forest maintain freshwater inputs to streams below Laupāhoehoe Forest. Stream gauges, used to measure natural stream flows, water quality and sediment in a non-destructive manner, are located in Manowai‘ōpae, Kaiwilahilahi, and Ka‘awali‘i streams below Laupāhoehoe Forest and are maintained by the USFS.

The 2014 State of Hawai‘i Water Quality Monitoring and Assessment Report (DOH 2014) was consulted to see if any of the project area streams are impaired based on the State of Hawai‘i water quality criteria. None of the streams within Laupāhoehoe Forest are identified within the report.

Determination of Effects

No-Action Alternative

Implementation of the no-action alternative would keep existing water resource conditions static. There would be no management related disturbance to streams or floodplains. Invasive species control

involves vegetation clearing and the use of herbicides and pesticides (toxicants). Temporary disturbance of the soil can occur when plants are removed or planted, providing the opportunity for changes to water runoff patterns; inappropriate use of herbicides and pesticides can impact water quality. All herbicides and pesticides are used in compliance with State and Federal law in conformance with all label requirements. Negative impacts to water resources associated with ungulate activity (rooting and wallowing behavior of pigs contributing to stream water turbidity due to soil erosion and inputs of pollutants to streams (i.e., animal waste)) would be anticipated to continue throughout the Laupāhoehoe Forest (except within the existing 35 fenced acres). A long slow decline of watershed function would be likely to continue. Some areas may remain pristine and unaffected for several decades, but the effects of feral ungulates, weeds, and predators would be expected to eventually severely compromise the ability of the forest to capture and effectively store water.

Preferred Alternative

The impacts to water resources associated with the additional actions proposed under full implementation of the Management Plan are as follows. Proposed conservation fencing would be anticipated to cross 3 existing streams (Kaiwilahilahi, Ha‘akoa, and Pahale). Best management practices would be incorporated during design and construction to minimize the potential for erosion and to ensure that stream flow is not obstructed or compromised during heavy rain events. For example, fence alignments would be selected to avoid steep inclines where possible, and to cross streams at strategic natural barriers, such as waterfalls or steep slips, so that the waterway remains clear but animals cannot pass into the fenced unit. For areas with low flow or intermittent flow, fencing may cross the streamway, but incorporate features such as a rubber mat that hangs down to prevent animal access during periods of low or no flow, but raises up to allow free flow of water during periods of higher flow. Fence construction would not be anticipated to have a long-term negative impact on water quality or quantity or make changes to stream hydrology. While minimal short-term soil disturbance would be unavoidable during fence construction, no lasting changes to existing patterns of runoff or percolation would be expected.

Trail improvement, development of the Shack Camp camping area, installation of management shelters, and development of landing zones would involve minor vegetation clearing using hand tools. The development of Shack Camp camping area would involve the installation of self-contained composting toilets to address the human waste associated with public recreational use of the area. The Shack Camp camping area, management shelters and landing zones would be sited away from existing streams. No impacts to existing streams are anticipated, and no lasting changes to existing patterns of runoff or percolation would be expected from these activities.

Due to the distance from the ocean, the limited footprint used by fencing and primitive trails, the

underlying soil characteristics, the existing patterns of runoff, and the incorporation of best management practices, impacts to marine water quality related to implementation of the Management Plan is anticipated to be negligible.

Conclusion

Both alternatives are in compliance with all laws, regulations, and policies associated with water resources, and implementation of any action alternative will follow applicable Federal, State and County regulations and policies. The effects of the additional actions proposed under the preferred alternative would be anticipated to have a minor, short-term negative effect on water resources within Laupāhoehoe Forest and a moderate, long-term positive effect by reducing soil disturbance associated with ungulate activity in forest around the upper reaches of three streams. No significant changes to the quality or quantity of existing discharges would be anticipated, and existing uses (aquatic habitat for native species) and the level of water quality necessary to protect those existing uses would be maintained or improved under both alternatives. No impact to marine water quality is anticipated under either alternative.

Fauna

Existing Conditions

Birds

Laupāhoehoe Forest was surveyed for forest birds as part of the Hāmākua Study area during the Hawai‘i Forest Bird Survey (1976-1983). This survey and several subsequent surveys of the area have provided information on the bird species present and their distribution.

The forest provides habitat for six honeycreepers (Subfamily Drepanidinae) endemic to the Hawaiian Islands. These include three endangered species: Hawai‘i ‘ākepa (*Loxops coccineus*), Hawai‘i creeper (*Oreomystis mana*), and ‘akiapōlā‘au (*Hemignathus munroi*). The non-endangered honeycreepers found in the project area include: ‘apapane (*Himatione sanguinea*), Hawai‘i ‘amakihi (*Hemignathus virens*), and ‘i‘iwi (*Vestiaria coccinea*). The USFWS is currently reviewing the status of ‘i‘iwi to determine whether it should be listed as endangered or threatened. Other native forest birds reported from the project area include ‘elepaio (*Chasiempis sandwichensis*), ‘ōma‘o or Hawaiian thrush (*Myadestes obscurus*), and pueo (*Asio flammeus sanwichensis*). Native forest birds are primarily found in the upper elevations (above 4,000 ft (1,219 m)) where lower numbers of mosquitoes and the effects of cooler temperatures on plasmodium parasite reduce the incidence of diseases such as avian malaria and pox. Hakalau Forest National Wildlife Refuge (NWR), where these species are seen regularly along with

many other native species, is adjacent to Laupāhoehoe Forest.

Other native bird species listed as endangered by the USFWS have been reported from the Laupāhoehoe Forest area including the koloa maoli or Hawaiian duck (*Anas wyvilliana*) and the ‘io or Hawaiian hawk (*Buteo solitarius*). Koloa maoli are generally found in a wide variety of natural and artificial wetland habitats including freshwater marshes, flooded grasslands, streams, montane pools, irrigation ditches, reservoirs, etc. ‘Io are found only on Hawai‘i Island, from sea level to about 5,600 ft (1,707 m) elevation; these birds of prey feed on rodents, insects, and small birds and typically nest in ‘ōhi‘a trees (Gorreson et al. 2008). The USFWS is currently reviewing the status of ‘io to determine whether to delist it as endangered.

A variety of non-native birds are also found within Laupāhoehoe Forest; the most widespread include hwamei (*Garrulax canorus*), Japanese white-eye (*Zosterops japonicus*), red-billed leiothrix (*Leiothrix lutea*), northern cardinal (*Cardinalis cardinalis*) and kalij pheasant (*Lophura leucomelana*). A list of the birds known from Laupāhoehoe Forest is provided in Table 4 of the Management Plan.

Mammals

Laupāhoehoe Forest is considered important habitat for Hawai‘i's only native land mammal, the ‘ōpe‘ape‘a – the endemic and endangered Hawaiian hoary bat, which uses the area for roosting, reproduction, and foraging. U.S. Geological Survey (USGS) Biological Resources Division Hawaiian Hoary Bat Project has monitored bats for five years and has found high levels of bat activity and occupancy within Laupāhoehoe Forest.

The ‘ōpe‘ape‘a is a medium-sized, nocturnal, insectivorous bat with short, thick, rounded ears and a furry tail. “Hoary” refers to the white-tinged, frosty appearance of the bat's grayish brown or reddish brown fur. The ‘ōpe‘ape‘a is a major predator of night-flying insects such as moths, beetles, and termites. Bats forage in open and wooded landscapes and linear habitats such windbreaks and riparian zones, and roost in trees with dense foliage and with open access for launching into flight. Females are believed to give birth to twins May – August and rear pups May – September (Menard 2001, Bonaccorso et al. 2008).

A variety of non-native mammals such as feral pigs, rats (*Rattus* spp.), mice (*Mus musculus*), cats (*Felis catus*), wild dogs (*Canis lupus familiaris*), and mongoose (*Herpestes auropunctatus*) have also been observed within Laupāhoehoe Forest.

Invertebrates

A wide range of endemic, native, and non-native invertebrate species are likely to be found within Laupāhoehoe Forest. Detailed invertebrate survey information for the entire Laupāhoehoe Forest is not

available, but native invertebrate composition is presumed to be higher in native-dominated areas and lower in areas previously disturbed by grazing or the prevalence of non-native plant species. Challenges to better information regarding invertebrate distribution and abundance include the cryptic nature of invertebrates, limited research interest or funding, and the fact that many species' life cycles are influenced by rainfall and other environmental variables, making invertebrate survey results difficult to compare over time and across sites.

Native invertebrates known from Laupāhoehoe Forest include numerous species of *Drosophila*. *Drosophila* are true flies (Order: Diptera); numerous adaptive shifts and unusual evolutionary developments characterize the species found in Hawai'i. *Drosophila* are specialized microbivores that rely on over 40 families of native plants, and recent declines in the genus are associated with the loss of these native plants. *Drosophila* species including *D. sproati*, *D. murphyi*, *D. tanythrix*, and *D. yooni* are relatively common within Laupāhoehoe Forest. One notable finding was of a female specimen believed to be *D. papala*, collected at 4,800 ft (1,463 m) elevation (DLNR and USFS 2015). In 2012, a researcher cataloging *Drosophila* species noted a small patch of pāpala kēpau (*Pisonia brunoniana*) at about 4,000 ft (1,219 m) elevation within the FR as the most diverse site sampled. Although too small to support any picture-wing species, this disjunct grove of mesic trees has a community of smaller *Drosophila* species not found elsewhere in Laupāhoehoe Forest (DLNR and USFS 2015). Some of these are associated with *Pisonia* in particular (*D. kambysellisi*, *D. nr. dissita*), while others are associated with other plants but seem to be attracted to the site. Several picture-wing species that breed in *Charpentiera*, *Pisonia*, and *Urera* were formerly known from lower elevations (~ 2,500 ft (762 m)), but this area within Laupāhoehoe Forest now appears to be composed largely of non-native plants, and no flies were found there on later surveys.

Laupāhoehoe Forest also contains habitat for four endemic species of pinao or Hawaiian damselfly. *Megalagrion calliphya* and *Megalagrion hawaiiense* breed in small pools or seeps in the forest, whereas *Megalagrion blackburni* breeds in streams. *Megalagrion xanthomelas* is a candidate for listing as an endangered species and is known from Kaiwilahilahi Stream below the lower boundary of Laupāhoehoe Forest (Parham et al. 2008).

Aquatic Species

The streams within Laupāhoehoe Forest provide habitat for endemic waterbirds, four gobies, two crustaceans, one snail, and several aquatic insects (e.g., damselflies, chironomids) that are noted in the Atlas of Hawaiian Watersheds and their Aquatic Resources (Parham et al. 2008). There are also two species of invasive amphibians that have been observed in or near streams in Laupāhoehoe, American bullfrog (*Rana catesbeiana*) and cane toad (*Rhinella marina*). Both of these species lay eggs in water and have a tadpole stage to their lifecycle.

Surface and groundwater that originate from the Laupāhoehoe Forest also support healthy populations of native nearshore fish assemblages. Many of these fish are an important component of the subsistence based economy in the region.

Determination of Effects

No-Action Alternative

Implementation of the no-action alternative would keep existing wildlife resource conditions static. There would be minimal short-term management related disturbance to wildlife habitat, associated with invasive species control and outplanting. Temporary disturbance can occur when plants are removed or planted. Negative impacts to wildlife resources associated with ungulate activity (e.g., rooting and wallowing resulting in breeding areas for disease carrying mosquitoes, uprooting native vegetation that acts as host plants for native invertebrates) would be anticipated to continue throughout the Laupāhoehoe Forest (except within the existing 35 fenced acres). Native animal species would be likely to continue their slow decline in the Forest. Some areas may remain pristine and unaffected for several decades, but the effects of ungulates, weeds, and predators would be expected to eventually severely degrade habitat.

Preferred Alternative

The impacts to wildlife resources associated with the additional actions proposed under full implementation of the Management Plan are as follows. Noise and activities associated with the construction of fencing, reforestation and outplanting, small mammal predator control, research, or trail improvement activities may affect, but are not likely to adversely affect, listed species (‘ōpe‘ape‘a, endangered honeycreepers, koloa maoli, or ‘io), native birds, native invertebrates, or native aquatic species, based on observations during conservation management in other areas statewide, including Hakalau NWR. Fencing design specifically does not incorporate barbwire, which has been shown to hook bats, to eliminate the possibility of harm after fence construction. Existing native species could be disturbed by fence construction and trail improvement activities, but because the total acreage to be disturbed by these activities is low and the habitat in the surrounding area (e.g., adjacent to the fence or trail corridor) is similar and could host any displaced populations, the short-term negative impacts would be expected to be minor. Additional planned mitigation measures include field surveys before finalizing fence or trail alignments or construction to prevent disturbance to native species (e.g., roosting bats or nesting birds), avoiding where possible the removal of native plants known to serve as habitat for native invertebrates or birds, and minimizing the removal of native vegetation. Reforestation of upper elevation portions of Laupāhoehoe Forest previously impacted by grazing and feral cattle would be anticipated to provide a long-term benefit to native wildlife, including ‘ōpe‘ape‘a, forest

birds, ‘io, and native invertebrates; information from the adjacent Hakalau NWR indicates that in areas that were pasture in 1987 but were the focus of ongoing reforestation, ‘amakihi, ‘apapane and ‘i‘iwi show strong evidence of increasing densities (USFWS 2012). Implementing small mammal predator control in forest bird habitat would be anticipated to benefit endangered birds by reducing predation rates. Over the long-term, moderate positive impacts would be anticipated due to forest restoration and the increased acreage of forested habitat protected from ungulate disturbance.

Conclusion

Both alternatives comply with all Federal and State laws, regulations and policies associated with wildlife, and a section 7 consultation with the USFWS will occur as necessary. Implementation of the Management Plan is anticipated to result in little to no impacts to wildlife and no adverse effects to listed species. The effects of the additional actions proposed under the preferred alternative would be anticipated to have a minor, short-term negative effect on wildlife within Laupāhoehoe Forest and a moderate, long-term positive effect by protecting important forested habitat from ungulate disturbance.

Flora

Existing Conditions

Laupāhoehoe Forest contains native-dominated forested landscapes from lowland forest at 2,300 ft (701 m) above sea level extending to almost 6,500 ft (1,981 m) in elevation. It is part of the largest remaining native dominated forest in Hawai‘i and largely dominated by ‘ōhi‘a and koa, the two most widespread tree species in native forest remaining in Hawai‘i. Laupāhoehoe Forest contains five primary native communities, as well as significant areas between 1,700 ft (518 m) elevation and ~ 3,000 ft (914 m) of highly altered, non-native dominated vegetation cover. Forestry plantings along the lower boundary and in the lower east corner include non-native trees such as toon (*Toona ciliata*) and *Ficus rubiginosa*, and in the upper north corner, tropical ash. The tropical ash has invaded significant portions of higher elevation areas of the Laupāhoehoe Forest. Other non-native species occupy large areas. Banana poka, an introduced vine, occurs throughout the mid to high elevation areas and forms thickets in the swales. At the lower edge of this community type, below 3,000 ft (914 m) elevation, the understory is heavily invaded by several non-native plants including strawberry guava, thimbleberry (*Rubus rosifolius*), clidemia or Koster's curse, Himalayan ginger, various grasses, and three species of parasitic strangler fig. A number of these species occur into mid or even high elevation areas of the Laupāhoehoe Forest. Non-native grasses and herbs are primarily pasture species (e.g., kikuyu grass (*Pennisetum clandestinum*), *Holchus lanatus*, and *Ehrharta stipoides*) and the vine German ivy.

Native plant communities include the Koa/‘Ōhi‘a Lowland Wet Forest, the Koa/‘Ōhi‘a Montane Wet

Forest, the ‘Ōhi‘a/Hāpu‘u/Uluhe Montane Wet Forest, the *Carex alligata* Montane Wet Grassland, and the Koa/‘Ōhi‘a Montane Forest. The Koa/‘Ōhi‘a Lowland Wet Forest dominates in the lowest elevation area up to about 3,000 ft (914 m) elevation, with portions badly invaded by invasive non-native species. Under the 80 ft (24 m) tall closed to open canopy of koa and ‘ōhi‘a is a secondary tree layer in which olomea (*Perrottetia sandwicensis*), mehame (*Antidesma platyphyllum*), ālani (*Melicope clusiifolia*), and kōpiko (*Psychotria hawaiiensis*) are common. Other trees, such as ‘ōlapa (*Cheirodendron trigynum*) and kāwa‘u (*Ilex anomala*) are present, but not as common. Hāpu‘u (*Cibotium glaucum*) is present, but of lower stature than in the Koa/‘Ōhi‘a Montane Wet Forest and forms a discontinuous layer. Common shrubs include manono (*Hedyotis terminalis*), kanawao (*Broussaisia arguta*), ‘ōhelo (*Vaccinium calycinum*), and saplings of kāwa‘u and ‘ōlapa. The vines ‘ie‘ie (*Freycinetia arborea*) and maile (*Alyxia stellata*) are present, and ‘ie‘ie is sometimes abundant. Native ferns include wahine noho mauna (*Adenophorus* spp.), *Lycopodium cernuum*, *Athyrium* spp., *Elaphoglossum* spp., *Sphenomeris chinensis*, and others. Rare plants observed in this forest type during surveys in the 1980s include *Cyrtandra giffardii*, *Cyanea tritomantha*, *Gardenia remyi*, and *Platydesma remyi*.

The Koa/‘Ōhi‘a Montane Wet forest distributes in areas from about 3,000 ft (914 m) elevation up to 4,500 ft (1372 m) elevation. It differs from the Koa/‘Ōhi‘a Lowland Wet Forest in its subcanopy species composition. Koa and ‘ōhi‘a form an open to closed canopy (about 100 ft (30 m) in height) with a very well-developed subcanopy of tree ferns (*Cibotium glaucum*, *C. chamissoi*, and *C. hawaiiense*). Trees in the secondary tree layer include ‘ōlapa, kāwa‘u, kōlea (*Myrsine lessertiana*), and pilo (*Coprosma rhynchocarpa* and *C. pubens*). In the understory, native shrubs include ‘ōhelo, ‘ākala (*Rubus hawaiiensis*), *Cyrtandra* spp., *Clermontia parviflora*, māmaki (*Pipturus albidus*), manono, and saplings of ‘ōlapa, ‘ōhi‘a, pilo and kāwa‘u. Ferns are often the prevalent ground cover, including *Asplenium* spp., *Dryopteris wallichiana*, ‘ākōlea (*Athyrium microphyllum*), *Ophioglossum pendulum* subsp. *falcatum*, and *Lepisorus thunbergianus*. The rare mint, *Stenogyne macrantha*, is known from the area between Kaiwilahilahi Stream and the NAR's western boundary.

The ‘Ōhi‘a/Hāpu‘u/Uluhe Montane Wet Forest occurs on the east side between 3,500 and 4,500 ft (1067 – 1372 m) elevation, almost bisecting the upper area of Koa/‘Ōhi‘a Montane Wet Forest. A tall (approximately 80 ft (24 m)) open to scattered canopy of ‘ōhi‘a with a secondary layer or native trees such as olomea, mehame, ‘ōlapa, and pilo and hāpu‘u grow over a layer composed largely of uluhe fern (*Dicranopteris linearis*). Under the hāpu‘u, there is a mix of native shrubs, such as manono, young ‘ōlapa, pilo, *Cyrtandra* spp., and *Clermontia parviflora*. Hō‘i‘o (*Athyrium sandwichianum*) is the most abundant native fern, although *Asplenium* spp., *Vandenboschia davallioides*, wahine noho mauna, *Elaphoglossum* spp., and *Lepisorus thunbergianus* are also present.

Much of the mid elevation area in Laupāhoehoe Forest, between about 4,000 and 4,500 ft (1220 – 1370 m) elevation is poorly drained and several low-lying, very wet sections are dominated by *Carex alligata*. Species from the surrounding natural communities, such as scattered ‘ōhi‘a, ‘ōlapa, and ‘ōhelo are also found in this community type.

The Koa/‘Ōhi‘a Montane Forest has been significantly altered by past land uses, including ranching and logging, and has also been heavily impacted by feral cattle. Compared to the Montane Wet Forest, the Montane Forest receives less rainfall; the annual rainfall is about 39.3 – 74.7 in (100-190 cm). The forest consists of scattered to open uneven canopy of 115 ft (35 m) tall koa emergent above 82 ft (25 m) tall ‘ōhi‘a. The tall stature trees tend to grow along the ridge formations. Swales between the ridges and open areas are dominated primarily by thick patches of ‘ākala. The understory has many species in common with the Koa/‘Ōhi‘a Montane Wet Forest, but the distinct hāpu‘u tree fern layer of the latter is absent. Species more characteristic of drier areas may also be components here. Ground cover is often dominated by native ferns, especially laukahi (*Dryopteris wallichiana*). Species found in this forest type include ‘ōlapa, pilo, manono, kāwa‘u, *Myoporum sandwicense*, kōlea, alani, *Ranunculus hawaiiensis*, *Sophora chrysophylla*, pūkiawe (*Styphelia tameiameiae*), and ‘ōhelo.

A diversity of native plants, including rare species, are found within Laupāhoehoe Forest. At least 30 different rare plant taxa, including 16 listed as endangered (6 of these with designated critical habitat overlapping with Laupāhoehoe Forest: *Clermontia peleana*, *Clermontia pyrularia*, *Cyanea platyphylla*, *Cyrtandra giffardii*, *Cyrtandra tintinnabula*, and *Phyllostegia warshaueri*), are known from Laupāhoehoe Forest or the adjacent areas, including one newly described or resurrected species (*Cyanea fernaldi*). A list of the rare plants with habitat in or near Laupāhoehoe Forest is provided in Table 3 of the Management Plan.

Human activity associated with management action, research, outreach and education, hunting, or recreational use could potentially spread invasive species into or across Laupāhoehoe on vehicles, gear, and equipment. Existing biosecurity measures are in place for all HETF associated activities (research, outreach) and for natural resource management actions by DOFAW to minimize the potential for introduction of new species and prevent the movement of established and incipient species, including plants, invertebrates, and soil-borne organisms, etc. These biosecurity measures include: 1) inspect and clean field gear and equipment before going into the field; 2) prepare a checklist of items to be inspected before any extended field operations or camping trip; 3) avoid carrying weed seeds from an infested part of the forest to the pristine areas; 4) keep vehicles clean; 5) pack out trash and unused food; 6) become acquainted with invasive species and their status in the area; 7) educate visitors to these protocols; and 8) report sightings of new invasive species or of existing high risk species in previously un-infested areas (DLNR and USFS 2015, Appendix B).

Fire is a threat to the drier upper elevation portions of the Laupāhoehoe Forest. Many fires are caused by humans, so increased human activity associated with management action, research, hunting, improved public access and the development of additional recreational amenities (new trails, Shack Camp) could increase the potential for fire in Laupāhoehoe Forest. Existing fire prevention measures will remain in place for all HETF associated activities (e.g., all permitted researchers shall possess a fire extinguisher at all times), and additional measures such as signage and the incorporation of fuel breaks around Shack Camp, would be integrated as additional recreational amenities are developed.

Determination of Effects

No-Action Alternative

Implementation of the no-action alternative would keep existing botanical resource conditions static. There would be minimal short-term management related disturbance to native habitat, associated with invasive species control and outplanting. Temporary disturbance can occur when plants are removed or planted. Negative impacts to botanical resources associated with ungulate activity (e.g., uprooting vegetation, eating and transporting invasive plants through defecation, and spread of root-rot fungi) would be anticipated to continue throughout the Laupāhoehoe Forest (except within the existing 35 fenced acres). The trend towards continued spread of invasive species, degrading native vegetation, and declining numbers of rare plants throughout the Forest would be anticipated to continue. Although DOFAW would continue to undertake efforts to protect and promote populations of rare plant species on a piecemeal basis, and some areas may remain unaffected for several decades, the effects of ungulates, weeds, and predators would be expected to eventually severely degrade habitat and contribute to a severe net loss of these species over the long-term.

Preferred Alternative

The impacts to botanical resources associated with the additional actions proposed under full implementation of the Management Plan are as follows. Construction of fencing, improvement of trails to primitive condition, and installation of camping sites at Shack Camp, management shelters and helicopter landing zones necessarily involves the removal of vegetation. Planned mitigation measures include field surveys before finalizing fence or trail alignments or locations for campsites, management shelters and landing zones and before construction to prevent damage or harm to rare plants, the incorporation of rare species protocols (e.g., flagging plants, identifying buffer zones), the avoidance where possible of the removal of large native plants and shrubs, and the minimization of the overall removal of native vegetation. Tent camping, management shelters, and landing zones would be sited, to the extent possible, in existing natural clearings or openings in the forest, to minimize the need for vegetation removal. Because of these mitigation measures, the short-term impact of fencing, trail

improvement, and installation of camping sites, management shelters and landing zones on rare plants is expected to be negligible and the short-term impact on native vegetation is anticipated to be minor because the total acreage to be disturbed by these activities is low. Over the long-term, moderate positive impacts would be anticipated to rare plants and native vegetation in general because of the acreage of existing habitat protected from ungulate disturbance and the availability of these units as reintroduction sites to support new populations of rare plants.

While the proposed fenced conservation units do not enclose large percentages of designated critical habitat, much of the existing critical habitat overlaps with low-elevation areas with significant invasion by non-native plants. Known populations of existing rare plants in these areas have already been protected with small fences (to protect the plant and allow for seed collection). To maximize the benefit of large-scale fencing to rare plant populations (and avoid the expensive and potentially unfeasible weed control that would be required with large-scale level fencing in the lower elevation), proposed fence alignments were largely selected to overlap with intact native forest that may serve as better quality reintroduction sites for the rare plants of Laupāhoehoe Forest than the degraded lower-elevation forested area currently designated as critical habitat.

Increased human activity associated with management action, research, outreach and education, hunting, or recreational use could result in further spread of existing or introduction of new invasive species into or across Laupāhoehoe. Existing biosecurity measures will remain in place for all HETF associated activities (research, outreach) and for natural resource management actions by DOFAW, and monitoring of invasive species presence and distribution will continue. Additional sanitation protocols, species-specific protocol, and protocols for other user groups (e.g., hunters, hikers) may be developed and adopted in the future as necessary to contain problem species or prevent their introduction or spread in Laupāhoehoe Forest.

Increased human activity associated with management action, research, hunting, improved public access and the development of additional recreational amenities (new trails, Shack Camp) could increase the potential for fire in Laupāhoehoe Forest. Existing fire prevention measures will remain in place for all HETF associated activities (e.g., all permitted researchers shall possess a fire extinguisher at all times), and planned measures such as signage and the incorporation of fuel breaks around Shack Camp, would be anticipated to prevent or minimize the impact of human-caused fire on botanical resources.

Conclusion

Both alternatives comply with all Federal and State laws, regulations and policies associated with botanical resources. Implementation of the Management Plan is not anticipated to result in a short-term

adverse impact to listed plants. With the incorporation of best management practices, a moderate long-term positive impact on rare plants would be anticipated because of the increased habitat protected from ungulate disturbance and available as protected reintroduction sites. The effects of the additional actions proposed under the preferred alternative would be anticipated to have a minor, short-term negative effect on native vegetation within Laupāhoehoe Forest and a moderate, long-term positive effect by protecting existing native ecosystems.

Hunting

Existing Conditions

Laupāhoehoe Forest is open to the public for game mammal and game bird hunting and is included within State Hunting Units B (FR – lower section between NAR and boundary), C (FR – upper section), and K (NAR) (Figure 4).

Table 3.1. Summary of Game Mammal Hunting Opportunities within Laupāhoehoe Forest

Hunting Unit	Method	Game animals	Bag limits	Season	Open Hunting Days
B	Rifle, muzzleloader, shotgun, handgun, archery, spears and knives. Dogs permitted.	Feral pigs, wild sheep, and feral goats	2 pigs, 1 goat, and 1 sheep per day; no season limit.	Year-round	Daily
C	Rifle, muzzleloader, handgun, shotgun, archery. Dogs not permitted.	Feral pigs and wild sheep	2 pigs and 1 sheep per day; no season limit	Year round	Saturday, Sunday, and state holidays
K	Rifle, muzzleloader, handgun, shotgun, spear, knife, or archery. Dogs permitted.	Feral pigs, feral goats, and wild sheep.	No daily or season limit.	Year round	Daily

Laupāhoehoe Forest Public Hunting Areas

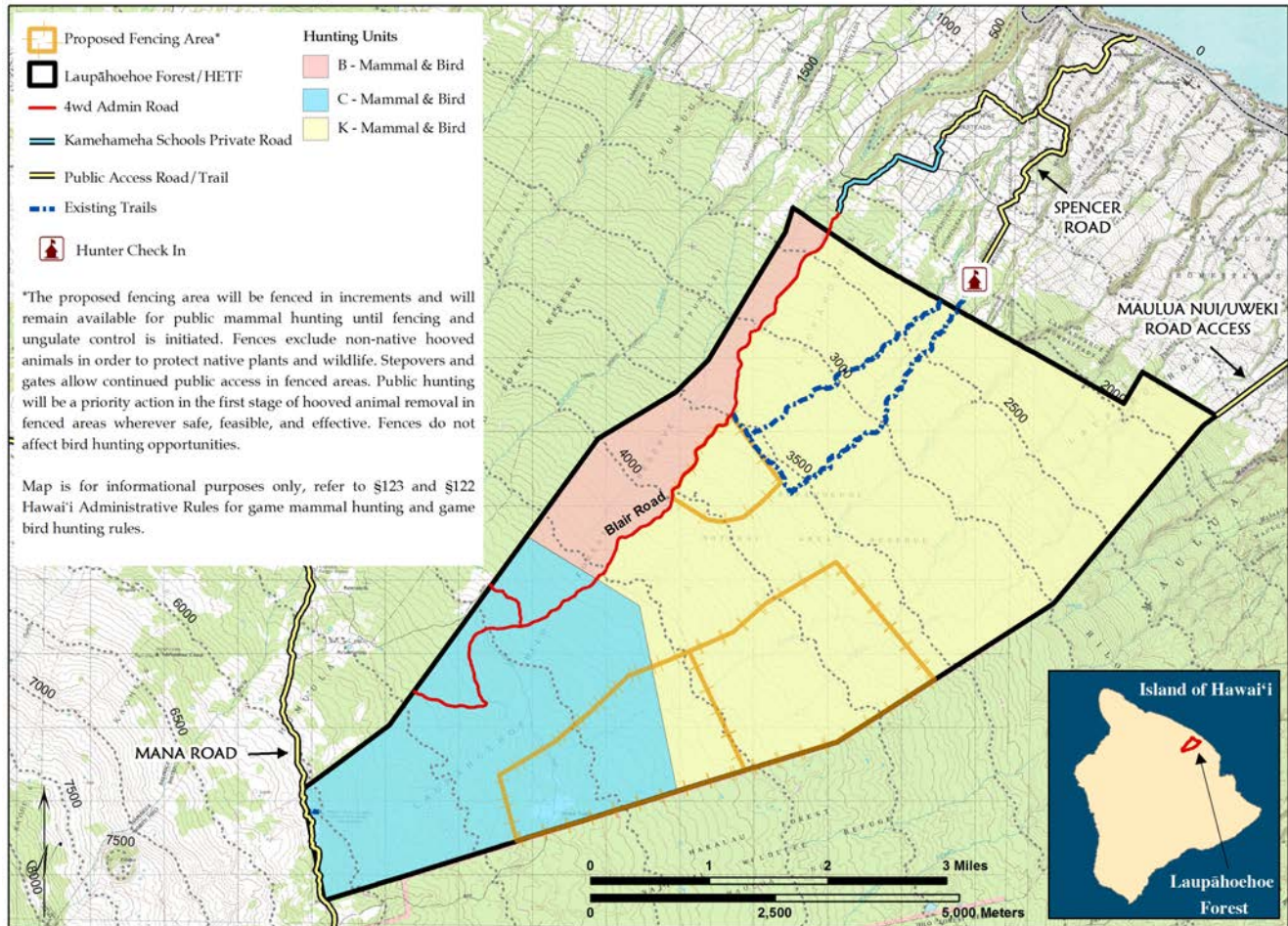


Figure 4. Laupāhoehoe Forest Public Hunting Areas

There are limited legal access points and only a few minimally maintained and marked trails. Mauka and makai public access to Laupāhoehoe is primarily via two main access points off Spencer Road and Mana Road respectively, and there is a hunter check station at the Spencer Road access. These roads provide vehicle access to approximately the forest boundary.

- **Spencer Road access** – The state has an easement through private pasture lands at the top of Spencer Road to allow for public pedestrian access to the lower boundary of Laupāhoehoe Forest. Spencer Road is a paved county road passable in a two-wheel drive vehicle. There is a small grassy area where vehicles may park mauka of where Spencer Road terminates. A primitive minimally user-maintained trail provides pedestrian access from the parking area to the forest.

- Mana Road access – Mana Road is four-wheel drive county road approximately 40 miles long that roughly traverses a contour along Mauna Kea. Mana Road is accessed via Mauna Kea Access Road (off Saddle Road) on the Hilo side or from the town of Waimea. The road intersects the top of Laupāhoehoe Forest. A Nā Ala Hele designated trail, Kaluakauka Trail, is accessed via this route.

In addition, the County of Hawaii recently acquired public access to the NAR from Uweki Road (“Maulua Nui/Uweki Road Access”) along the northern property boundary of TMK (3) 3-4-002:004 as a part of a subdivision action. The public access agreement creates a public parking easement to accommodate not less than three vehicles and public pedestrian access to the NAR within a 10-foot wide corridor.

It is unknown how many people use Laupāhoehoe Forest for hunting. Detailed hunter use data is not available, and information from the Spencer Road check station would provide an incomplete picture of hunter use at best as it is self-reported and would not reflect the usage or success by hunters accessing Laupāhoehoe Forest from Mana Road or Maulua Nui/Uweki Road Access. Discussions with local residents and land managers indicate that feral pigs are the primary game for hunting in the Forest, although wild sheep and goat may also be present within the Reserve. All hunting in the State requires a hunting license; 10,673 hunting licenses were sold statewide in 2014 (DBEDT 2015); approximately 30% of the statewide total are Hawai‘i Island residents. An unknown number of people without hunting licenses hunt illegally within Laupāhoehoe Forest.

Determination of Effects

No-Action Alternative

Implementation of the no-action alternative would keep existing hunting conditions within Laupāhoehoe Forest static. DOFAW would likely continue to undertake efforts to increase hunter access on a piecemeal basis, as funding and staffing allowed.

Preferred Alternative

The impacts to hunting associated with the additional actions proposed under full implementation of the Management Plan are as follows. The Management Plan proposes the construction of fencing of conservation units (approximately 2,659 total acres) to protect intact native forest from feral ungulates. Public hunting will be incorporated into the first phase of ungulate removal after fencing is complete, but because the goal is to remove all hooved animals, over the long term, the total acreage available for public hunting of game mammals would be reduced by approximately 2,659 acres (22%). The acreage available for public hunting of game birds under existing regulations would remain constant.

The siting of conservation units reflect an attempt to avoid areas of high hunter activity while concentrating on areas with high-quality intact native forest. Most of the proposed fencing is located at some distance from existing access points into Laupāhoehoe, on the forested area bordering Hakalau NWR. While some public comment on the Management Plan related to impacts on hunting in general (e.g., loss of acreage, objections to fencing in general), there have been no specific objections raised to the location of the proposed conservation units.

The Management Plan also supports improvement of public access and recreational opportunities within Laupāhoehoe Forest that may positively impact hunters. Specifically, the Plan proposes that the State work with adjacent landowners to work on alternative access to the forest, pursue potential land acquisitions through fee simple purchase (which could eliminate private land barriers), and consider acquisition of long-term leases of state or private land adjacent to the forest when current leases expire. In addition, the Management Plan identifies other actions to maintain or improve public hunting opportunities in Laupāhoehoe Forest: facilitate additional hunter education classes in Laupāhoehoe region, consider changes to the permitted hunting method for Unit C if desired by the hunting community, and work with DOCARE to address hunting community concerns about illegal activities.

The impact on hunting is anticipated to be minor to moderate. While there may be a moderate negative impact on individuals who travel distances within Laupāhoehoe Forest, off-trail and away from established access points, to preferred hunting locations within the proposed conservation units, the surrounding 78% of Laupāhoehoe Forest will remain an accessible alternative to them, as will hunting areas elsewhere on the island of Hawai‘i. To the general hunting community, the negative impact is anticipated to be minor, because the majority of Laupāhoehoe Forest will remain available for hunting (78%), and because game animals will remain able to move freely from mauka to makai portions of Laupāhoehoe Forest.

Conclusion

Implementation of the no-action alternative would keep existing hunting conditions static; implementation of the Management Plan is anticipated to have a minor to moderate negative impact on hunting.

Public Use: Recreation, Education, Illegal Use

Existing Conditions

Laupāhoehoe Forest is open to the public for various recreational and cultural uses. While the public is permitted to access and hike or hunt in any portion of the forest, as noted previously, there are limited

legal access points and only a few minimally maintained and marked trails. This area is rough and remote rainforest wilderness and there are currently no amenities for recreational users. There is no data available on individual use (e.g., unguided hiking, wildlife viewing, gathering) within Laupāhoehoe Forest, but the numbers are thought to be extremely low (less than 50 visits a year).

Laupāhoehoe Forest is also accessible through organized education and outreach programs. USFS is a partner with Laupāhoehoe Community Public Charter School to develop ways to integrate curriculum with hands-on experience; other recent outreach programs have involved a service component (e.g., invasive species removal). One hundred and nine participants on nine trips visited Laupāhoehoe Forest in 2014 for education/outreach activities, up from 13 participants on two trips in 2013, and three participants on one trip in 2012. In addition, with the completion of the Laupāhoehoe Science and Learning Center, another 133 people visited the Center for service learning, work on the ‘Ōhi‘a Common Garden (restoration of land adjacent to the Center with ‘ōhi‘a seedlings), and a staff/volunteer retreat.

Illegal human activity occurs on a small scale, primarily in the form of poaching, illegal camping, off-road all-terrain vehicle use, dumping, unpermitted harvesting (koa, maile, hāpu‘u, and other native trees and plants), marijuana cultivation, and vandalizing signs and fences. Due to the remoteness and limited access, however, illegal use (besides poaching) is not currently a major problem.

Determination of Effects and Conclusion

No-Action Alternative

Implementation of the no-action alternative would keep existing conditions static. Access to the Forest would continue as is but would not be improved for either the general public or residents.

Preferred Alternative

The impacts to public use associated with the additional actions proposed under full implementation of the Management Plan are as follows. The Management Plan proposes improvement of public access and recreational opportunities within Laupāhoehoe Forest that may positively impact recreational users. Specifically, the Management Plan identifies existing trails (Spencer and Peneki) for maintenance as primitive trails, and proposes the development of additional primitive trails 1) along the north fence line (upper boundary) from Mana Road to Blair Road, 2) connecting Spencer to Peneki and Peneki to Blair, 3) along the approximate route of the historic Maulua trail alignment, 4) from Mana Road to the Maulua Road, roughly parallel to the southern forest boundary and running through the proposed camping area at Shack Camp, and 5) from Blair Road to the south boundary, roughly following the FR and NAR boundary (between the 4,500 and 5,000 ft elevation) (Figure 5). The Management Plan also

identifies the development of primitive camping in the area of Shack Camp, consisting of up to ten tent sites, a management shelter that would be available for public use by reservation, self-contained composting toilets, and a covered open-sided shelter for cooking. No vehicular access to the Shack Camp area would be provided; users would hike in from Mana Road.

Laupāhoehoe Forest Public Access, Recreation & Infrastructure

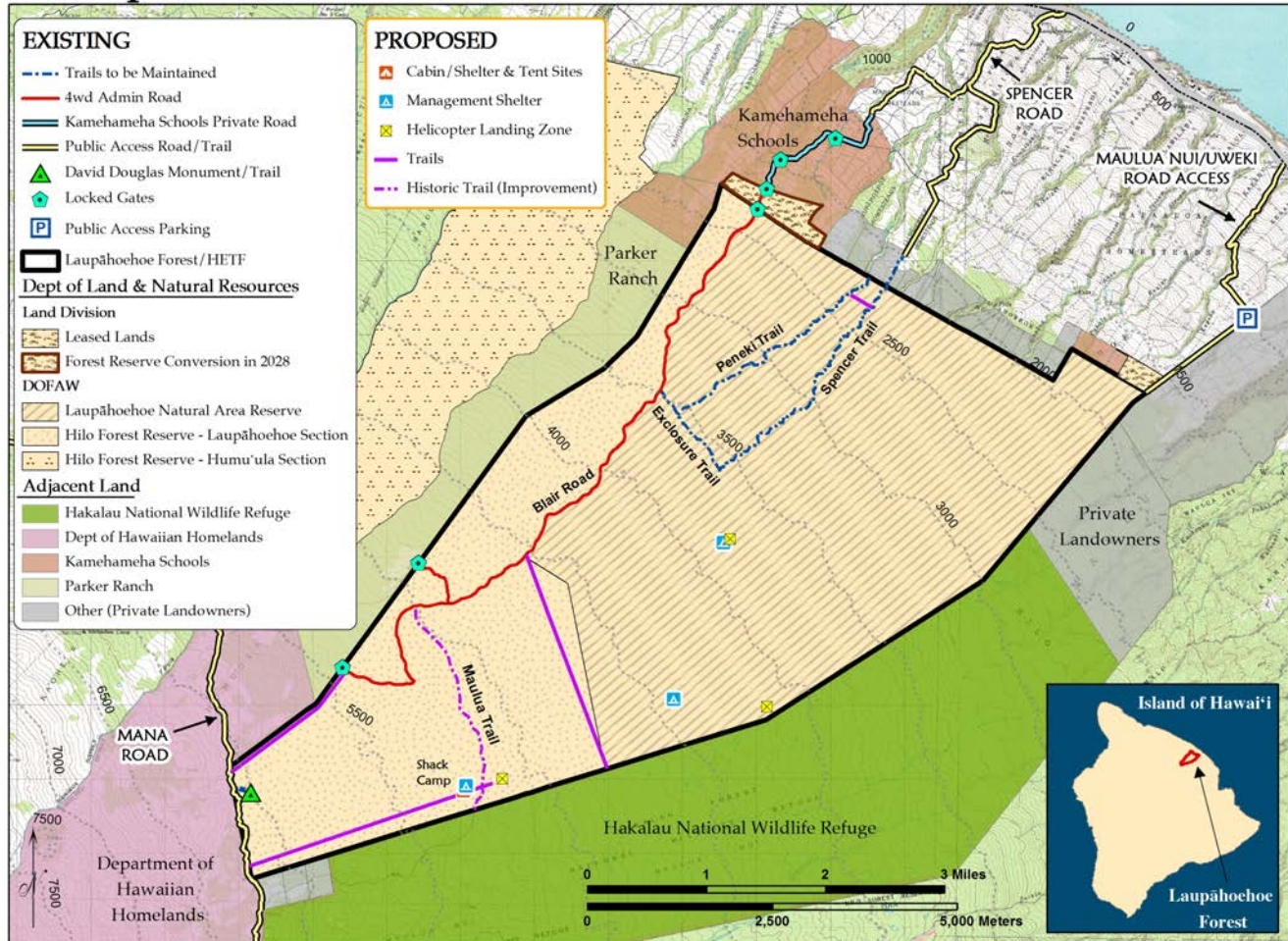


Figure 5. Laupāhoehoe Forest Public Access, Recreation & Infrastructure

In addition, the Management Plan proposes that the State work with adjacent landowners to work on alternative access to the forest, pursue potential land acquisitions through fee simple purchase (which could eliminate private land barriers), and consider acquisition of long-term leases of state or private land adjacent to the forest when current leases expire. While additional trails, primitive camping, and improved access could lead to increased visitation by individuals, it is uncertain how much of an increase could realistically be expected given that in the context of Hawai'i Island, Laupāhoehoe is relatively remote rainforest wilderness. However, the increased hiking and camping opportunities

would be anticipated to provide a minor long-term positive impact on recreational use. A minor long-term positive impact on public use (both recreational and cultural) would be anticipated from increased access to Laupāhoehoe Forest.

Increased human activity associated with improved public access and the development of additional recreational amenities (new trails, Shack Camp) could increase the potential for fire in Laupāhoehoe Forest. Fire prevention measures would include increased educational efforts, including signage, and the incorporation of fuel breaks around Shack Camp and other similar fire pre-suppression actions to reduce fire potential and minimize fire severity as a result of recreational activities.

Increased visitation associated with the maintenance or improvement of trails could increase the potential for trespassing or unauthorized camping on adjacent land. Because Laupāhoehoe is relatively remote rainforest wilderness, trespassing is not anticipated to become a significant problem, and signage would be incorporated along trails as necessary.

The Management Plan proposes several actions to encourage training, demonstration, and outreach within Laupāhoehoe Forest. Increased support (in terms of staff time and funding) could be expected to increase total participation and more opportunities to visit. Because no changes to the existing review and permitting system are proposed, which includes review of the type of activity and incorporates best management practices to minimize impacts from group use, no measurable impacts to the Forest associated with increased education or outreach efforts would be anticipated.

The Management Plan does not identify any actions that would impact illegal use; thus, no changes from the existing condition are anticipated.

As such, the anticipated impact on public use as a result of implementation of the Management Plan is anticipated to be long-term, minor and positive.

Research

Existing Condition

Research within Laupāhoehoe Forest requires a permit; permit applications are reviewed by a subset of the HETF Planning Group, which includes representatives from both the USFS, DOFAW, and the LAC. All research permits are valid for one year. Visitation related to research varies from year to year, depending on the number of active research projects and the specific needs of the particular research project. There were 14 active research projects in Laupāhoehoe Forest in 2014 (7 renewals and 7 new); 26 active projects in 2013 (13 renewals and 13 new); and 19 active projects in 2012 (12 renewals and 7 new). Approved research must provide GPS coordinates of the study site and include a closeout plan

that details how and when infrastructure related to the project (e.g., flagging, markers, etc.) will be removed. Infrastructure related to historic research is considered trash, and when reported and verified as abandoned (as opposed to related to ongoing research with a valid permit), the remaining items are removed.

Determination of Effects and Conclusion

No-Action Alternative

Implementation of the no-action alternative would keep existing conditions static.

Preferred Alternative

The Management Plan proposes to promote and encourage basic and applied research; however, no substantive changes to the existing review and permitting system are proposed, so no change from the existing condition is anticipated with regard to impacts associated with research.

Socioeconomic resources

Existing Condition

The population of Hawai‘i Island has grown from 120,317 persons in 1990, to 185,079 persons in 2010, and to an estimated 194,191 persons in 2014. The Laupāhoehoe Census Designated Place (CDP) encompasses the community makai of Laupāhoehoe Forest; the estimated total population in 2010 was 581 persons residing in 214 housing units. Median household income in 2014 was estimated at \$63,333 (up from \$30,000 in 2000), with an estimated 11.7% of the population below the poverty level (down from 28.4% in 2000). Median age of residents rose from 42.9 to 44.6 years between 2000 and 2010. The 2010 census found that Laupāhoehoe CDP was comprised by three dominant ethnic categories (reported alone or in combination with one or more other races): White, Asian, and Native Hawaiian and other Pacific Islander (US Census Bureau 2015).

The draft Hāmākua Community Development Plan describes the people of the region as follows:

“For some, Hāmākua is a place where their ancestors flourished for centuries and for others, agricultural employment drew their ancestors to emigrate from foreign lands. Here they raised their children and learned to love the land and sea as their own. Still others have come in search of a simpler way of life, drawn by the beauty of the land and a host of personal stories that testify to the magical attraction that draws people to places where they feel at home. Together, these groups form the modern communities of Hāmākua.

Regardless of their background, the people of Hāmākua share a deep appreciation for the

historical heritage of their small towns and highly value preserving an ‘ohana-centered community that emphasizes quality of life, neighborhood cooperation, and the aloha spirit. The people of Hāmākua recognize that their future is tied to the preservation of their way of life and the natural and cultural resources that have sustained them for generations” (County of Hawai‘i 2015).

Tourism, agriculture and government services are the main economic drivers on Hawai‘i Island. For a century, the sugar industry dominated the economics of the Hāmākua region, until sugarcane production ended in 1996. Some former sugar lands were converted to lands for forestry products, ranching/grazing, and specialty agricultural crops such as orchid farms, tropical fruit and macadamia nut. Employment by industry in 2000 demonstrated a wide variety of fields; the top four were arts, entertainment, recreation, accommodation, and food services (21%); educational, health, and social services (19%), retail trade (13%) and agriculture, forestry, fishing, and mining (8%).

Employment associated with Laupāhoehoe Forest includes on-site natural resources management by the State DLNR (DOFAW staff), administration of the HETF by USFS (primarily permitting, planning and coordination, and communication between USFS, DLNR and advisory council), and coordination of education/outreach efforts. NAR staff for the island of Hawai‘i work in all 8 NAR on the island, including Laupāhoehoe and currently consist of 6 State employees, 6 UH contractors, and 2 year-round interns. Forestry staff work in all 19 forest reserves on the island, including Hilo Forest Reserve Laupāhoehoe Section, and currently consist of 8 State employees. USFS staff works across the Hawaiian Islands and the Pacific, and staff dedicated to the HETF currently include two full-time administrative staff and the IPIF Director.

The resident population of Hawai‘i Island is supplemented by an average daily visitor population of about 29,255. Part of the visitor experience includes visits to natural areas or wildlife viewing: over 1,600,000 people visited Hawai‘i Volcanoes National Park and over 220,000 people visited Pana‘ewa Rainforest Zoo and Gardens in 2014 (DBEDT 2015). In 2011, the number of people that reported participated in wildlife viewing as a primary form of recreation totaled 358,000 in Hawai‘i (US Department of Interior et al. 2014). Spending associated with wildlife viewing in Hawai‘i totaled \$669 million, of which 94 percent (\$628 million) was trip-related expenditures and \$41 million was spent on other expenses such as equipment. However, with limited legal access points to Laupāhoehoe Forest and only a few minimally maintained trails and no commonly available visitor information, Laupāhoehoe Forest is not currently an attraction to tourists and spending associated with wildlife viewing in Laupāhoehoe Forest, if any, would likely be quite small.

The economic value of Laupāhoehoe Forest encompasses more than just the impacts on the regional economy. The Forest provides substantial non-market values (values for items not exchanged in

established markets) such as maintaining endangered species, preserving wetlands, educating future generations, and adding stability to the ecosystem (Carver and Caudill 2007). One reported study estimated the total value of ecosystem services provided by natural habitats (forests, shrubland, grassland, and wetlands) in the National Wildlife Refuge System in the contiguous states and estimated these services totaled \$32.3 billion/year (Southwick Associates 2011). While wetlands were found to provide the most services, forests were estimated to provide approximately \$1.1 billion/year, or \$1,014/acre/year (Southwick Associates 2011). Using these numbers, the ecosystem services provided by Laupāhoehoe Forest could be estimated at \$12.5 million per year. Similarly, various studies have found that people would pay an average anywhere from \$8 (striped shiner) to \$186 (monk seal) and \$269 (humpback whale) to preserve populations of various rare, endangered or useful species; the amount people were willing to pay varied depending on whether they were residents or visitors to an area where the species exists, the rarity of the species, the charisma of the species, and a variety of other factors (Southwick Associates 2011). While none of the included studies estimated willingness to pay for Hawai‘i’s terrestrial species, it gives some idea of the existence value people place on the wildlife around them.

The non-market values of Laupāhoehoe Forest are recognized and valued by the local community, as identified during the outreach phase for the Community Development Plan. Specifically, the Hāmākua community identified the value of the mauka forests, rich in biodiversity and critical habitat, the abundant rainfall, streams, and watershed resources, and the existing protection of these mauka areas as assets for the region.

Determination of Effects and Conclusion

No-Action Alternative

Implementation of the no-action alternative would keep existing socioeconomic resource conditions static. Over the long-term, native ecosystems and watershed integrity would be likely to continue their slow decline as a result of continued ungulate activity, weeds, and predators, negatively impacting the community-recognized assets of Laupāhoehoe Forest.

Preferred Alternative

The impacts to socioeconomic resources associated with the additional actions proposed under full implementation of the Management Plan are as follows. Increasing the acreage of protected ungulate-free native habitat could be expected to encourage related conservation spending associated with rare plant reintroduction, research, or other conservation projects. Full implementation of the Management Plan is estimated to cost approximately \$10,512,500 over 15 years, which could generate secondary benefits by providing jobs in other industries where monies are spent. The preferred alternative is not

expected to have any negative economic impacts. Positive economic impacts would result from the release of project funds into the State economy and the encouragement of additional related conservation spending. However, given that funding required for full implementation of the Management Plan has not been secured, and given the size of the proposed actions relative to the overall State budget or to other economic inputs into the local economy, effects on economic resources would be anticipated to be minor.

Cultural and Archaeological Resources

Methodology

The following steps were taken to determine the cultural and historical significance of Laupāhoehoe Forest and assess the potential impact on these resources: (1) the development of the Management Plan through a collaborative planning process with the Laupāhoehoe Advisory Council (LAC), including members with cultural resources expertise and involving at least eleven public meetings; (2) general literature review, including review of the cultural impact assessment *Hilo Palikū – Hilo of the Upright Cliffs: A Study of Cultural-Historical Resources of Lands in the Laupāhoehoe Forest Section, Ahupua‘a of the Waipunalei-Mauluanui Region, North Hilo District, Island of Hawai‘i* (Maly and Maly 2006); (3) field inspections of known or suspected historic features within Laupāhoehoe Forest by State Parks archaeologists; and (4) the sending of pre-consultation letters to a variety of agencies, organizations, and individuals that might be interested or have relevant information, including the County of Hawai‘i Cultural Resources Commission, the State Department of Hawaiian Home Lands, the Office of Hawaiian Affairs, the State Historic Preservation Division, Kamehameha Schools, the Hawai‘i County Native Hawaiian Chamber of Commerce, the Hawaiian Civic Club of Hilo, and others.

Cultural Impact Assessment

In 2006, Kumu Pono Associates prepared *Hilo Palikū – Hilo of the Upright Cliffs: A Study of Cultural-Historical Resources of Lands in the Laupāhoehoe Forest Section, Ahupua‘a of the Waipunalei-Mauluanui Region, North Hilo District, Island of Hawai‘i* (Maly and Maly 2006), in conjunction with the proposal to designate Laupāhoehoe Forest as part of the HETF. The research conducted as part of the study is consistent with Federal and State laws and guidelines for such studies, including the November 1997 guidelines for cultural impact assessment studies adopted by the Environmental Council; the NHPA; the Advisory Council on Historic Preservations “Guidelines for Consideration of Traditional Cultural Values in Historic Preservation Review”; National Register Bulletin 38, “Guidelines for Evaluating and Documenting Traditional Cultural Properties”; and the Hawai‘i State Historic Preservation Statute (HRS Chapter 6E) and associated administrative rules. The study

involved both review of archival-historical literature and field visits and interviews with elder kama‘āina. The report serves as an important reference for cultural resources management in the Laupāhoehoe Forest and provides invaluable information on the cultural context of the area. It references the ethnographical and historic uses of the region, and identifies several historic, ethnographic and archaeological site types and features that may be found in the area. The report is the primary source for the information in this section; the complete study is available online at <http://www.hetf.us/page/resources>).

Field inspections

In 2015, three archaeologists from the DLNR-Division of State Parks conducted field inspections of four selected areas within Laupāhoehoe Forest that could be impacted by actions proposed in the Management Plan: 1) a transect running roughly along the 3,500 ft elevation contour (general location of proposed conservation fencing); 2) a transect running almost the entire width of Laupāhoehoe Forest roughly along the 5,000 ft elevation contour, corresponding with historic location of Maulua Trail and including the area known as Shack Camp (location of trail improvement and development of primitive camping); 3) the intersection of surveyed boundaries for the lands of Laupāhoehoe, Waipunalei, and Humu‘ula (location of proposed forest restoration); and 4) the area of the monument commemorating David Douglas (report attached as Appendix D). The inspections were conducted to assess the probability of historic properties within these potentially affected areas and to provide a basis for recommending any further steps needed to identify and appropriately manage historic properties within the project area. Ground visibility varied among the areas inspected; ground visibility was best along most of the Maulua trail route and at the boundary intersection where tropical ash restricts growth of understory species and feral pig rooting helps eliminate ground cover. Visibility was worst in the Shack Camp area and at or near the David Douglas monument due to the thick cover of kikuyu grass. Visibility was moderate along the lower elevation (3,500 ft) transect, with immediate ground surfaces mostly visible due to pig damage disrupting ground cover.

Pre-consultation

Of the various stakeholders receiving the pre-consultation letter, only the County of Hawai‘i Cultural Resources Commission provided comments (full letter included in Appendix B). The Commission identified potential historic features within Laupāhoehoe Forest, including Waipunalei Trail, Shack Camp, Maulua Trail, the Dr. David Douglas monument, requested archaeological surveys for these areas and evaluations for inclusion on the State and National Register of Historic Places, provided recommendations for inadvertently discovered cultural resources, and identified a newly created public access into Laupāhoehoe Forest (Maulua Nui/Uweki Road Access). The Commission's comments have been incorporated into the summary below and will be incorporated into the Final Management Plan.

The Cultural Resources Commission also noted that the Draft Management Plan mentions that gathering for Native Hawaiian religious and customary gathering rights requires an HETF permit and requested additional information on the permit process; this information was added in the final Management Plan. Small-scale non-commercial harvesting or salvage is allowed in the FR section of Laupāhoehoe Forest, including materials for cultural uses. Non-timber forest products such as ferns, maile, flowers, fruits, and lei-making materials, etc. for cultural or personal use may be collected from within the FR and is permitted and regulated by DOFAW through the FR System permit procedures (HAR § 13-104). Permit applications for gathering plant material in the FR can be obtained from the DOFAW office in Hilo and permits are available, upon approval, free of charge (for common, personal use items) or for a fee, depending on the purpose. Gathering of materials from listed endangered species is not permitted. Gathering (including Native Hawaiian religious and customary gathering rights) within the NAR section of Laupāhoehoe Forest is regulated by NAR rules and procedures (HAR § 13-209) and is more limited, in recognition of the unique natural resources found within the individual NARs and the requirement of HRS § 195-1 (“to preserve in perpetuity specific land and water areas which support communities, as relatively unmodified as possible, of the natural flora and fauna, as well as geological sites, of Hawaii”). Special use permit applications for activities in the NAR can be obtained from the DOFAW office in Hilo. DOFAW's permit process is not intended to restrict constitutionally protected cultural practices, but is in place to ensure protection of unique natural resources and avoid over-collection of a particular resource, minimize the potential for user conflict (e.g., to ensure that approved research is not sited in areas commonly used by cultural practitioners), and to provide safety or resource information (e.g., provide notification during periods of high fire threat or provide recommended protocols to reduce the spread of invasive species, etc.). The Management Plan does not recommend changes to the current permitting procedure; however, DOFAW and USFS will evaluate its policies and permitting procedure to ensure protection of Hawaiian rights as identified under judicial decisions.

Land Use History and Summary of Historic Features

The Laupāhoehoe Forest and surrounding areas have a rich history that has shaped the way the landscape looks today. The surrounding Hāmākua region was historically known as a powerful religious, economic, and demographic center of Hawai‘i Island and from early times, the region was known for its agriculture (County of Hawai‘i 2010). Laupāhoehoe Forest is situated in the upper lands of what is now generally called the ahupua‘a of Laupāhoehoe, situated within a larger traditional district of Hilo Palikū (Hilo of the upright cliffs). The history of Laupāhoehoe is tied to the history of its neighboring lands, and over the generations, residents from a number of land areas accessed the Laupāhoehoe forest region for religious purposes, to acquire prized natural resources, and for cultural

practices (Maly and Maly 2006).

As stated by Maly and Maly, “[t]he forest lands of this region represent significant native (endemic and indigenous) resources, and are part of a unique cultural landscape – in that the native flora, fauna, mist, rains, water, natural phenomena and resources, are all believed to be *kino lau* (the myriad body-forms) of gods, goddesses, and lesser nature spirits of Hawaiian antiquity. Knowledge of the environment and respect for the resources, ensured a sustainable life upon the land. And in their evolving relationship with natural resources such as those of this region, Hawaiians came to consider everything about them as godly manifestations. Care for, and respect of the earth, meant that in-turn, the earth would care for the *kānaka* (people)” (Maly and Maly 2006). Travel through the forest was undertaken with prayer, caution and respect, and damage to living forests was punished by acts of nature such as heavy rains to wash out the path or dense mists or vegetation growth to hide the trail.

To elaborate, “[i]n Hawaiian culture, natural and cultural resources are one and the same. Native traditions describe the formation (literally the birth) of the Hawaiian Islands and the presence of life on and around them, in the context of genealogical accounts. All forms of the natural environment, from the skies and mountain peaks, to the plateau lands, watered valleys and lava plains, and to the shoreline and ocean depths are believed to be embodiments of Hawaiian gods and deities” (Maly and Maly 2006). In the traditional context, “the mountain landscape, its native species, and the intangible components therein, are a part of a sacred Hawaiian landscape. Thus, the landscape itself is a highly valued cultural property. Its protection and the continued exercise of traditional and customary practices in a traditional and customary manner, are mandated by native custom, and State and Federal laws” (Maly and Maly 2006).

The importance of the Laupāhoehoe region to the Native Hawaiians, particularly the koa forests, mountain bird habitats, and the traditional trails which connected the lowlands with the mountain lands and neighboring districts, were frequently mentioned in traditions and historical accounts (Maly and Maly 2006). “Practices such as trapping birds and collecting feathers, or hunting selected species of birds for food; felling koa for canoe making; travel to the region where the forests end, and on to the summit of Mauna Kea; the interment of remains and deification of family members on the mountain lands have been recorded” (Maly and Maly 2006). In addition, battles fought on the Laupāhoehoe lands were among those that established the kingdom of chiefs between the early 1500s to the late 1700s (Maly and Maly 2006).

There are also a number of ancient named sites, including trails within the forest area and along its boundaries with other land, including:

- Ha‘akoa (an area associated with the chief, ‘Umi, and location of an important heiau);

- Keauhua‘ai (a hillock at the top of Laupāhoehoe – place where David Douglas died);
- Kūlanihāko‘i (an area at the top of the Laupāhoehoe-Waipunalei boundary, where a mountain shelter once existed);
- Kulipalapala (an old shelter in the forest, along the Kaiwilahilahi – Kapehu – Maulua boundary);
- Ninika (a boggy region in the Laupāhoehoe – Maulua forest);
- Pu‘ukole (an ancient site of a shrine for bird catchers, and shelter for those who traveled to the upper forest zone);
- Pu‘ukoa (a koa covered hill on the upper boundary of Kaiwilahilahi and Kapehu); and
- Pu‘ulehu (a shelter of canoe makers and bird catchers on the Laupāhoehoe – Maulua boundary) (Maly and Maly 2006).

Based on the report by Kumu Pono Associates, the following types of archaeological sites associated with the pre-contact era would be found in the Laupāhoehoe Forest:

- trails extending from the shore to the mountain lands;
- shelters and resting places along trail sides;
- shrines used by travelers, bird catchers, canoe makers, and other practitioners;
- battle sites and hiding places; and
- possible burial sites.

Traditional features would include several forms, ranging from stone platforms, terraces, cairns, and walls; and shelter features – called pāpa‘i by the ancient Hawaiians – generally made of wood, leafy branches and ferns. Many of the features would naturally deteriorate and evidence of them would return to the earth. Other features of stone might still be visible in the understory, though only found upon careful search. Finally, there could be stone filled fractures or crevices, and caves, which were sometimes used for shelters over generations, or as burial sites, and as places in which to hide valued cultural artifacts (Maly and Maly 2006).

The lowland region in places like Waipunalei, Laupāhoehoe, and Maulua, extending from the shore to around the 3,000 ft elevation, supported residential and agricultural activities; the upper forest regions were frequented by travelers, collectors of natural resources, and for a wide range of cultural practices. By the time of westerners recording travel between the shore of Laupāhoehoe and the upper mountain

lands, the Laupāhoehoe-Waipunalei trail had become the primary route of travel, with other trails only known to native residents of the land (Maly and Maly 2006).

For much of the post-contact period to the mid-1800's, the land use within Laupāhoehoe would not have changed significantly, but indirect impacts to the forest would have begun as cattle and goats introduced by George Vancouver in the 1700s spread across the island. In the mid-1800s, the lower elevation forest up to about the 2,000 ft elevation was cleared for sugar cultivation, the development of flumes and water resources, and homestead lots (Maly and Maly 2006). Wild cattle were in great numbers and fairly wide-ranging across the slopes of Mauna Kea, impacting the upper elevation forest. In the early 1800s, base camps and huts were built in the Keanakolu area (within the nearby Humu'ula section of Hilo FR) for bullock hunting, which developed into formal ranching operations in the 1850s for both cattle and sheep (Maly and Maly 2006). As ranching developed, similar infrastructure (shelters, fenced pens, trails) was built along the routes used to drive cattle to steamer landings or other markets; forest was cleared and timber harvested to support these operations. Grazing continues to this day in the general region surrounding Laupāhoehoe Forest.

Sites associated with the ranching era identified in the larger Laupāhoehoe region include:

- Maulua Trail, established as an old pack trail, first appearing on a 1916 map, running roughly north from Shack Camp.
- Shack Camp, a 125 acre fenced area leased from the Territory of Hawai'i by Kūka'iau Ranch, located on the Maulua-Laupāhoehoe boundary. There remain on the land in the present-day, the ruins of small house (or shack), deteriorated feeding and watering troughs, scattered fruit trees, a pole for the telephone line installed by Kūka'iau Ranch in 1922, and a large pond.
- Noted places such as Keanakolu (not the same location of the present-day cabin of that name), Lahohinu, and Keahua-ai (Douglas Pit) are considered significant features of the historical landscape.
- David Douglas Monument, an eight-foot tall stone monument constructed in 1934 to honor the botanist.
- Laupāhoehoe-Waipunalei trail, a historic trail which appears on maps as far back as 1875 (Maly and Maly 2006), and generally follows the boundary between Laupāhoehoe Forest and adjacent privately owned land in Waipunalei.
- The sheep ranch station at Keanakolu (in the original place of that name, near the Laupāhoehoe-Humu'ula boundary). There remain on the land in the present-day, the ruins of stone shelters, pens and foundations.

The Hilo FR was established in 1905 to protect the remaining forest resources and the watershed, with the lower boundaries of the FR lands marking the edges of the homestead lots. A FR monument was placed at a place named Kulanihakoi (also transcribed as Kulanikakoi and Kulanikekoi) to mark the mauka boundary of the FR between Waipunalei and Laupāhoehoe; remnants of the post was found during the field inspection at this site. The Civilian Conservation Corps (CCC), established by the Federal government in the 1930s, constructed fences to control feral sheep and limit their entry into forested watershed areas and participated in tree planting and road and trail maintenance around the island, including at Laupāhoehoe.

In the 1970s, a Hawaiian woodcraft manufacturer, Blair Woods Hawai‘i, was granted permission to access Laupāhoehoe Forest to harvest koa and ‘ōhi‘a within upper Laupāhoehoe under certain conditions; the State determined that the invasive banana poka, impacts from cattle, and the death of trees made salvage of lumber viable and that logging would encourage koa regeneration. The 4 WD road known as “Blair Road” was constructed to access the acreage approved for harvesting activities; harvesting ceased in 1979 and the road has been used by DOFAW for management purposes since that time.

Four areas were selected for field inspections because observations by DOFAW staff or historic records indicated a higher probability of historic properties in these areas and because planned management actions that could affect these properties were planned in the general area. No field inspection was conducted in the vicinity of the Laupāhoehoe-Waipunalei historic trail because no evidence of the historic trail was observed during previous visits to the area by DOFAW staff, and no new management activity was proposed in this area (Figure 6).

Laupāhoehoe Forest Historic Properties and Planned Management

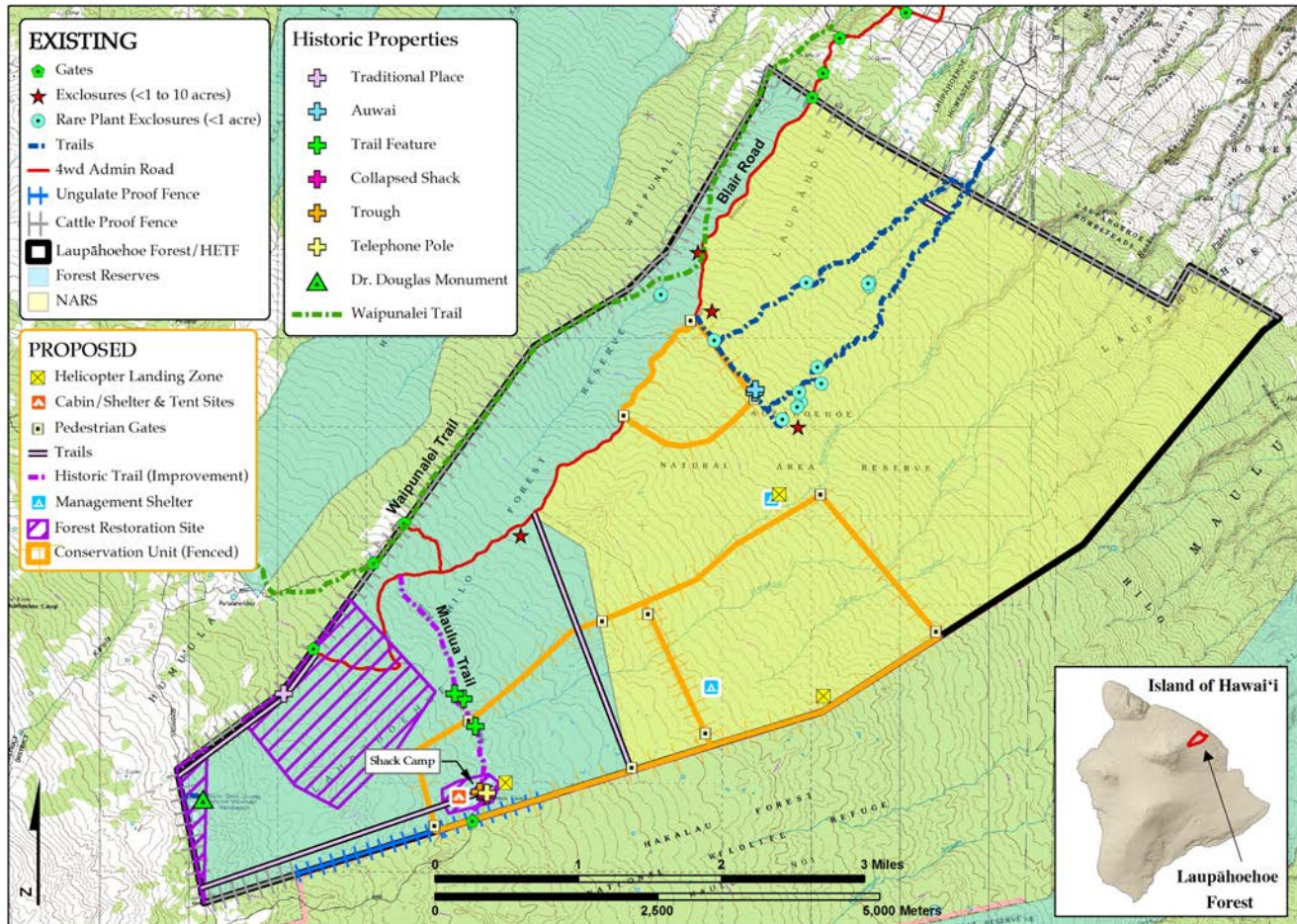


Figure 6. Laupāhoehoe Forest Historic Properties and Planned Management

The following five potential historic properties were identified during the 2015 field inspections (see Appendix D).

1) Maulua Trail section (transect roughly at 5,000 ft elevation) – Segments of the historic Maulua trail had been identified previously by NARS staff along the trail's route shown on USGS topographic maps. Cattle were presumably driven from the fenced complex at Shack Camp along the trail or the trail became a shortcut for ranch hands moving to and from the coast or other ranch lands. The trail was recognizable when the edges were defined by stone alignments or curbing, cuts in embankments or slopes when the trail crossed ridges or uneven terrain, or leveled segments of stone and soil in flatter areas. State Parks archaeologists mapped a trail segment 154 ft (47 m) long that included a distinct ramp feature cut into a sloping ridge face and a retaining wall feature near its base; trail width varied from four to 11 ft (1.4 to 3.5 m), with most sections eight feet (2.5 m) wide. Attempts to follow the trail

beyond the mapped segment were unsuccessful.

2) Shack Camp Ranching Complex (along transect roughly at 5,000 ft) – Known as Shack Camp as early as 1916, this 125 acre fenced area had at least two water sources, a pond and spring. State Parks archaeologists found a collapsed and badly deteriorated small house (or shack), deteriorated feeding and watering troughs, scattered fruit trees, a small orchard of fruit trees on the rise above the house, a pole for a telephone line, and the large pond shown on maps. The spring shown on a 1916 map was not located.

3) Traditional Place at Ahupua‘a Boundaries – The Boundary Commission was established in 1862 to certify the boundaries for the ahupua‘a awarded to the major ali‘i in the Great Mahele of 1848. The Commission received testimony from two Native Hawaiians with personal knowledge of the lands, boundaries, or place names of the mauka boundary between Waipunalei and Laupāhoehoe. One testified as to the presence of a water hole, and the other mentioned living in the area while shooting bullock on the lands of Humu‘ula. A 1916 map shows a FR Monument marking the boundary and depicts a water hole adjacent to the boundary. State Parks archaeologists found the old FR monument and a low, broad depression that could have been the water hole. Though the depression was dry, sediments indicated that the water still ponds there. Directly inland was a natural rock formation with very distinct surface patterns next to the base of what was once a very large koa tree. No other features of note or evidence of past use were seen in the area.

4) David Douglas Monument – The stone monument to honor Scottish botanist David Douglas remains present in an open, grassed area; a trail leading to the monument is maintained and marked with signage. The eight-foot tall triangular and tapered stone pillar sits on a triangular base and is topped with a single rock. Bronze plaques dedicate the monument, list those responsible for its construction in 1934, and (installed in 2014) commemorates the 108th anniversary of his death and 100th anniversary of the publication of his journals. If evidence of bullock pits or other uses of this area still exist, they are hidden by the dense grass and underbrush.

5) ‘Auwai or Ditch feature (transect roughly along the 3,500 ft elevation). Segments of a probable ditch or ‘auwai had been previously identified by NARS staff along the route used to access existing endangered species enclosures in the lower elevation, wet rain forest. The feature (which could be followed for a total of 167 ft (51 m)) appeared to be a long open trench cut into the rocky, soil embankment of a ridge and at angles and elevations conducive to water flow. Widths varied from 27.5 to 59 in (70 to 150 cm) and depths from 12 to 66 in (30 to 170 cm). Portions of the trench have collapsed, while others were no longer well defined due to erosional slippage or filling. The State Parks archaeologists confirmed that it was a manmade feature, and that a ditch seemed to be the feature's most likely function. However, the feature was puzzling, as it is located above the productive

agricultural zone for Native Hawaiian and subsequently introduced crops given the cooler temperatures at this elevation and the high percentages of cloud cover per hour and day throughout the year. While some association with the use of Laupāhoehoe Homestead lands for ranching or sugar cultivation is possible, those lands are at least two miles downslope of the ‘auwai.

Other than the features described above, no archaeological sites or historic properties were found in areas covered during these field inspections. These observations support general predictive models that the probability of archaeological sites in these upland forested areas is very low. Known uses of forested areas, mostly documented in the historic record, were primarily transient, intermittent, or periodic and left few durable remains behind. Thick vegetation growth and ground disturbance by feral animals, particularly pig rooting and wallowing, have likely obscured or obliterated any cultural deposits or stone alignments that might have remained in the area. The findings also are consistent with the results of other studies along the upper portions or margins of the FR; historic properties remaining in these areas mostly reflect periods of wild cattle hunting, ranching, or early forestry and watershed initiatives.

Determination of Effects

No-Action Alternative

Implementation of the no-action alternative would keep existing cultural and archaeological resource conditions static. Ground disturbance by feral animals, particularly pig rooting and wallowing, could continue to degrade or obliterate undocumented remnant cultural deposits or stone alignments. Habitat and watershed values could degrade as a result of continued ungulate disturbance, and many resources important for gathering and other cultural associations would be diminished or lost altogether, including native plants and birds.

Preferred Alternative

Construction of fencing, improvement of trails to primitive condition, development of the Shack Camp camping site, and installation of management shelters and helicopter landing zones necessarily involves the removal of vegetation and limited ground disturbance. The recommendations for the treatment of cultural resources as detailed in the Kumu Pono study would be incorporated during all phases of implementing the Management Plan:

“In regards to work which may be undertaken in the proposed Laupāhoehoe HETF, it is important that cultural resources – both tangible and intangible – be respected. For example, should fencing programs or work shelters be developed, care to ensure that cultural remains are not impacted, should be taken. It should be the goal of any undertaking to minimize the foot-

print, and ensure that the landscape is left in a natural state. Fencing programs, to protect treasured natural-cultural resources from degradation by introduced animals have a long history in the region. Fencing and control of feral animals dates from the nineteenth century, and was expanded with the development of the forest reserve programs. Early fencing programs were at times destructive of the resources, today, programs designed to minimize the impacts should be employed. All participants in oral history interviews we have conducted over the last ten-plus years for lands of the Hilo forest region and Mauna Kea mountain lands have expressed the thought that care of the land, cultural resources, and forest is important.

We recommend that the HETF program managers and field crew members meet with a Department of Land and Natural Resources – State Historic Preservation Division (DLNR-SHPD) staff person, prior to undertaking any work on fence lines or other ground altering activities. All field crew members employed on any projects in the preserve should be informed of Historic Preservation Guidelines, and made aware that if any stone feature (such as walls, terraces, mounds, platforms, shelters, caves, trails, or boundary *ahu*) are found, work in the area is to be stopped and modified so as to minimize impacts on such features. The management staff should also monitor all clearing as it is undertaken, to ensure proper treatment of sites, should any be discovered. Should cultural sites be encountered, it is recommended that members of the Hawaiian community at Laupāhoehoe – such as Nā Waiwai o Laupāhoehoe – be contacted, and consultation regarding site treatment should be undertaken along with representatives of the DLNR-SHPD.

The Hawai‘i State Historic Preservation Statute (Chapter 6E), which affords protection to historic sites, including traditional cultural properties of ongoing cultural significance; the criteria, standards, and guidelines currently utilized by DLNR-SHPD for the evaluation and documentation of cultural sites should be complied with. The Hawai‘i Island Representative of DLNR-SHPD should be notified of any findings, when made.

If inadvertently discovered, burial remains should be protected in place. Work in the immediate vicinity of the remains should be terminated, and the Hawai‘i Island Representative of DLNR-SHPD should be notified of any findings. Final disposition of remains will be determined in consultation with DLNR-SHPD, and Native Hawaiian descendants of the families associated with Laupāhoehoe and adjoining lands. If any burial remains should be discovered, they shall be treated on a case-by-case basis in concurrence with Chapter 6E-43 (as amended by Act 306).

Finally, it is suggested here, that if funding opportunities arise, and a work-force be needed for various projects (e.g., fencing, game control, and resource monitoring, etc.) that individuals with historical ties to the Laupāhoehoe lands be involved in the programs. Research and

stewardship programs will have greater long-term success when members of the local community are informed and active participants. Educational opportunities for local school programs will also help to inform communities of the values of the research being done, while researchers will also be exposed to traditional and historical values the community places on the natural and cultural landscape” (Maly and Maly 2006).

One goal of the Management Plan is to protect the existing cultural and archaeological features found within Laupāhoehoe Forest. Actions in the Laupāhoehoe Forest Management Plan are subject to historic preservation review under Hawai‘i State and Federal laws and regulations, specifically Sections 6E-7 and 8, HRS, and the implementing administrative rules (HAR Chapter 13-275). Actions are also subject to Section 106 of the NHPA and its implementing regulations if funded through the USFS.

As such, before implementing management actions that could impact historic features (e.g., development of Shack Camp camping site, restoration of Maulua trail, installation of fencing), DOFAW and the USFS will prepare an archaeological inventory survey, to document and delineate the known historic features listed above, to identify planned measures to avoid negative impact to historic features, and where appropriate, to identify planned interpretation or preservation plans. The archaeological inventory survey will also evaluate the properties' significance for inclusion on the State and National Register of Historic Places. The inventory survey and consultation with SHPD will be completed before any ground disturbance near known historic features will occur.

Should evidence of any unanticipated archaeological or cultural properties be encountered during implementation of the Management Plan, the activity would immediately cease and the appropriate parties would be consulted immediately. Wherever possible, cultural resources would be avoided. Minimization options, in addition to site avoidance by relocating activities, would include data recovery, using either collection techniques or *in-situ* site stabilization protection.

All State and Federal employees, permittees, and the public are required to comply with State and Federal laws relating to the protection of cultural resources. All cultural and historical sites should be left alone and artifacts should not be collected. Burial sites and archaeological sites are often accidentally disturbed either by nature (erosion) or by human activity through projects that involve excavation. HAR Chapter 13-300 addresses rules of practice and procedure relating to burial sites and human remains. If a burial site is discovered, activity in the immediate area must be stopped and remains left in place. Reporting a burial site disturbance is required by law (HRS Chapter 6E) and reports of burial sites or other discovered cultural resources (such as but not limited to prehistoric artifacts, stone platforms, cairns, caves, etc.) should be made immediately to SHPD.

Because of the limited number of documented features within Laupāhoehoe Forest, the low likelihood of undiscovered archaeological sites due to the elevation and dense rainforest setting, and the planned additional field work and mitigation measures to be incorporated to avoid damage or harm to known or unanticipated resources, the negative impact on cultural and archaeological resources is expected to be minor. Over the long-term, minor positive impacts would be anticipated as a result of the increased documentation of the historic features associated with the ranching era and the protection of native forest from ungulate disturbance.

No specific cultural practices have been identified that may be impacted by implementation of the Management Plan, either during development of the Plan or during pre-consultation. However, to ensure continued public access into and within Laupāhoehoe Forest, conservation fencing will incorporate gates or step-overs at known access points or along historic trails, and additional step-overs will be added after construction as necessary. For cultural practices such as gathering, the applicable FR and NAR rules and procedures apply (HAR § 13-104 and HAR § 13-209) based on the location of the proposed practice. DOFAW's permit process is not intended to restrict constitutionally protected cultural practices, but is in place to ensure protection of unique natural resources and avoid over-collection of a particular resource, minimize the potential for user conflict (e.g., to ensure that approved research is not sited in areas commonly used by cultural practitioners), and to provide safety or resource information (e.g., provide notification during periods of high fire threat or provide recommended protocols to reduce the spread of invasive species, etc.). The Management Plan does not recommend changes to the current permitting procedure; however, DOFAW and USFS will evaluate its policies and permitting procedure to ensure protection of Hawaiian rights as identified under judicial decisions.

As noted previously, “the mountain landscape, its native species, and the intangible components therein, are a part of a sacred Hawaiian landscape, which itself is a highly valued cultural property. Its protection and the continued exercise of traditional and customary practices in a traditional and customary manner, are mandated by native custom, and State and Federal laws” (Maly and Maly 2006). The Management Plan is specifically directed at the long-term protection of Laupāhoehoe Forest and its natural and cultural resources found within Laupāhoehoe Forest and proposes no substantive changes to existing traditional and customary practices. As such, implementation of the Management Plan is anticipated to have a positive impact on the landscape and on traditional and customary practices (by protecting the native forest in which those practices may occur).

Consultation with SHPD pursuant to HRS § 6E-8 and NHPA § 106, and with the Hawai‘i County Cultural Resource Commission as a § 106 consulting party, would occur as necessary to confirm that proposed actions would have no adverse effect on the historic resources within Laupāhoehoe Forest,

and mitigation requirements, if any, resulting from this consultation would be incorporated and implemented as appropriate.

Conclusion

Both alternatives are in compliance with laws, regulations, and policies associated with archaeological and cultural resources. Mitigation measures to be incorporated into all phases of implementing the Management Plan will avoid negative impacts to existing and previously unidentified cultural and archaeological resources. The no-action alternative is anticipated to have a long-term negative impact on cultural and archaeological resources due to continued degradation of the landscape by feral ungulates and invasive weeds. With the mitigation measures in place, implementation of the Management Plan is anticipated to have a short-term minor negative impact and a long-term minor positive impact on cultural and archaeological resources.

Scenic resources

Existing Conditions

Landscape character represents distinct attributes of landform, vegetation, surface water features, and cultural features that exist in the landscape. In the largest context of place, the Hawaiian Islands are considered unique. The extreme isolation of the islands produced, through evolution and specialization, a remarkable collection of species found nowhere else on the planet. These natural treasures are integral elements of the biological and cultural heritage of the Hawaiian Islands and their people.

From the scenic perspective the Laupāhoehoe Forest lies on the lower northeasterly facing flank of Mauna Kea, mauka of the Hāmākua coastline in the District of North Hilo. From the highway and the communities of the Hāmākua region, the boundaries of Laupāhoehoe Forest are indistinguishable from the adjacent mauka forested land (Hakalau NWR, Parker Ranch, Hilo FR), which provides a scenic mountainous backdrop of lava flows, dense native forest and shrubland, and pasture and grassland. Lava rock extrusions and overland flows create interesting texture and color in the landscape; and views of the summit of Mauna Kea are generally obstructed by vegetation, topography, or both. The scenic values of the mauka forests of the Hāmākua region are recognized generally within the Hawai‘i County General Plan and Hāmākua Community Development Plan.

Within Laupāhoehoe Forest, there is a very limited viewing audience: a few ranchers and hunters, research scientists, land managers, hikers, educators and their audiences, and extensive scenic vistas are typically obstructed by vegetation, topography, or both.

Determination of Effects and Conclusion

No-Action Alternative

Implementation of the no-action alternative would keep existing scenic conditions static.

Preferred Alternative

There would be no anticipated impacts on scenic resources associated with the additional actions proposed under full implementation of the Management Plan. Conservation fencing would not be visible beyond the immediate vicinity of fence; any planned trail improvements will be primitive, with limited clearing and marking of the trail way, and thus would not be visible beyond the immediate vicinity of the trail. No areas considered natural beauty sites within the Hawai'i County General Plan would be adversely affected.

Summary of Effects

The following table summarizes the anticipated impacts. The effects related to implementing each alternative are described in terms of the change from current conditions (i.e., the environmental baseline). Alternative 1, the no-action alternative, would continue present management actions. However, the consequences of implementing Alternative 1 may have positive, negligible, or negative effects. For example, under current management, failure to control ungulate populations would result in a long-term, moderate, negative impact on native flora.

Table 3.2 Summary of Effects

	Alternative 1 (No Action)	Alternative 2 (Preferred) Implementation of Management Plan
Soil	Long-term, minor, negative	Short-term, minor, negative Long-term, minor, positive
Air quality	Negligible	Negligible
Noise	Negligible	Negligible
Water	Long-term, minor, negative	Short-term, minor, negative Long-term, minor, positive
Fauna	Long-term, minor, negative	Short-term, minor, negative Long-term, minor, positive
Flora: rare plants	Long-term, moderate, negative	Short-term negligible Long-term, moderate, positive
Flora: native vegetation	Long-term, moderate, negative	Short-term, minor negative

	Alternative 1 (No Action)	Alternative 2 (Preferred) Implementation of Management Plan
		Long-term, moderate, positive
Hunting	Negligible	Long-term, minor to moderate, negative (reduced hunting acreage) Long-term, minor, positive (improved access)
Public Use: Recreation, Gathering, Education, Illegal Use	Negligible	Long-term, minor, positive
Research	Negligible	Negligible
Socioeconomic Resources	Long-term, minor, negative	Long-term, minor, positive
Cultural and Archaeological Resources	Long-term, minor, negative	Short-term, minor, negative Long-term, minor, positive
Scenic Resources	Negligible	Negligible

Section 4. Cumulative Impacts

A cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time (40 CFR 1508.7). Table 4.1 lists the past, present, and reasonably foreseeable future actions in and near the project area. Many activities listed within this table have been long-standing existing activities within the area.

Table 4.1: Past, Present, and Foreseeable Future Actions Near Laupāhoehoe Forest

Agency or Ownership	Past and Ongoing Activities	Future Activities
USFS	The Laupāhoehoe Science and Learning Center, consisting of a bunk house, toilet and showers, and meeting/class room was completed in 2015.	
State DLNR	Grazing within and around the Laupāhoehoe Forest and for the past 30	Continued grazing on lands adjacent to Laupāhoehoe Forest,

Agency or Ownership	Past and Ongoing Activities	Future Activities
	years.	anticipated to be similar in scale as past activities.
USFWS	The Hakalau Forest NWR is adjacent to the Laupāhoehoe Forest/HETF. USFWS frequently does restoration work using volunteers. Road access to their areas uses alternative routes. Typical volunteer usage is approximately 10-12 people/weekend year-round.	Anticipated to be similar in scale as past and ongoing activities. Potential expansion makai (Koa Forest and Maulua Gulch units) and to the northwest (Kūka‘iau Ranch), dependent on funding.
USDA-FS, other agency, State, private	Research and monitoring (including maintenance of stream gauges in Kaiwilahilahi, the Ha‘akoa, and Ka‘awali‘i Streams at approximately 2,000 ft elevation, of weather station adjacent to Blair Road at 3,500-4,000 ft elevations).	Similar to past activities; may involve both continuation of long-term research and initiation of new short and long-term research. Specific research depending on funding and academic/agency interest and information needs.
Mauna Kea Watershed Alliance	Conservation actions to protect and enhance watershed ecosystems, biodiversity and resources, covering 500,000 acres across the upper elevation Mauna Kea landscape, including invasive weed removal, fencing, reforestation.	Anticipated to be similar in scale to past and ongoing activities.
Department of Hawaiian Home Lands (DHHL)	Primarily grazing on 56,200 acres on the northeast slopes of Mauna Kea. The ‘Āina Mauna Legacy Program received final approval in 2011: goal is to develop an economically self-sustaining improvement and preservation program for the natural and cultural resources; proposes multiple actions including native forest and wildlife habitat restoration, invasive species eradication, sustainable commercial koa forestry, eco-tourism, and infrastructure improvements.	Activities outlined in the ‘Āina Mauna Legacy Program plan are anticipated to increase in scale over time as the plan is implemented.
Parker Ranch	Grazing and salvage koa logging at Waipunalei.	Anticipated to be similar in scale to past and ongoing activities.

Agency or Ownership	Past and Ongoing Activities	Future Activities
Kūka‘iau Ranch	Conservation easement on 3,830 acres – to discontinue cattle ranching and restore to koa forest (2012 funding through DOFAW Forest Legacy Program).	Koa forest restoration anticipated to continue and over time, increase overall acreage of koa forest.

Alternative 1

Under the no-action alternative, the slow and insidious degradation of the native forest and watershed of Laupāhoehoe primarily due to ungulate disturbance and the spread of invasive species would continue to occur. The cumulative effect would eventually reduce the area of healthy native forest on the island of Hawai‘i to perhaps unsustainably low levels for recovery of certain rare plants, animals and habitat.

Alternative 2

In general, cumulative effects as a result of implementing the Laupāhoehoe Forest Management Plan are either minor and do not require spatial mitigation, or they are beneficial. Cumulative effects from local, short-term disturbances caused by fence construction, trail improvement or maintenance, or additional outreach events (noise, emissions, traffic) are expected to be extremely minor, temporary and insignificant. Reforestation of the upper-elevation area of Laupāhoehoe Forest and fencing approximately 2,694 acres of intact native forest would increase forested areas and add to the acreage on Hawai‘i Island that is protected from ungulate disturbance. When considered with other planned actions near Laupāhoehoe Forest, the conservation actions would be anticipated to be cumulatively beneficial and contribute to the recovery of (or prevent the extinction of) endangered plants, endangered forest birds, the ‘io, the koloa maoli, and the ‘ōpe‘ape‘a.

Hunters have expressed concern in the past about the cumulative effects on hunting because they observe the increase in acreage of areas proposed for fencing as part of NWR management, watershed initiatives, private actions, and Forest Reserve and NAR management plans, and feel there is an ongoing loss of hunting area. DOFAW provides over 950,000 acres of hunting areas statewide with over 600,000 acres of public hunting area on the island of Hawai‘i (FR, Game Management Area, and NAR). Public hunters are a valuable conservation partner, but public hunting alone cannot prevent

ongoing damage to the native rare plants and animals found in Hawaii's forests. Approximately 14 percent of DOFAW lands (10% on Mauna Kea, 4% elsewhere) is currently considered under “high-level protection” with fencing and feral ungulate control programs in place. Under the most ambitious current plans for fencing and ungulate removal over the next decade, another eight percent of DOFAW lands on the island would be affected, including the identified conservation units in the Laupāhoehoe Forest Management Plan. In an effort to balance all of DOFAW's mandates, approximately 22% of Laupāhoehoe Forest (0.4% of DOFAW lands) is proposed to be fenced to protect native plants and animals and to conserve valuable watershed, implemented over 15 years, with the majority of the forest unfenced and available for game mammal hunting. In this context, the cumulative effect of the Laupāhoehoe Forest Management Plan on public hunting is not considered significant.

Section 5. Consistency with Hawai‘i State Plan and Coastal Zone Management Act

Hawai‘i State Plan

Themes, Goals, and Objectives

Initially adopted in 1978 and updated over time, the Hawai‘i State Plan establishes a set of themes, goals, objectives and policies that are meant to guide the State's long-range development and provide a basis for determining priorities and allocating limited resources. The overall theme of the Plan is that Hawai‘i's people, as both individuals and groups, generally accept and live by a number of principles that are an integral part of society: individual and family self-sufficiency, social and economic mobility, and community or social well-being. The State goals are identified as:

- “(1) a strong, viable economy, characterized by stability, diversity, and growth, that enables the fulfillment of the needs and expectations of Hawai‘i's present and future generations;
- (2) a desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people;
- (3) physical, social, and economic well-being for individuals and families in Hawai‘i, that nourishes a sense of community responsibility, of caring, and of participation in community life” (HRS §226-4).

HRS §226-102 outlines the overall direction and provides that “[t]he State shall strive to improve the quality of life for Hawai‘i's present and future population through the pursuit of desirable courses of action in seven major areas of statewide concern which merit priority attention: economic development,

population growth and *land resource management*, affordable housing, crime and criminal justice, quality education, *principles of sustainability*, and *climate change adaptation*” (emphasis added to areas relevant to the Laupāhoehoe Management Plan). Specifically, priority guidelines for climate change adaptation state “encourage the preservation and restoration of natural landscape features, such as coral reefs, beaches and dunes, forests, streams, floodplains, and wetlands, that have the inherent capacity to avoid, minimize, or mitigate the impacts of climate change” (HRS §226-109(5)).

HRS Chapter 226 provides objectives and policies for population, the economy, the physical environment, facility systems, and socio-cultural advancement. Among these, the most relevant to the Laupāhoehoe Management Plan are §§ 226-11 (land-based, shoreline, and marine resources), 226-12 (scenic, natural beauty, and historic resources) and 226-13 (land, air, and water quality), which identify the protection of Hawai‘i’s unique and fragile environmental resources, the enhancement of Hawai‘i’s scenic assets, natural beauty, and multi-cultural/historical resources, and pursuit of improved quality of Hawai‘i’s air, land and water resources, and greater awareness and appreciation of Hawai‘i’s environmental resources as objectives.

Discussion

Implementation of the Laupāhoehoe Management Plan is consistent with and implements the Hawai‘i State Plan by protecting the natural resources of Laupāhoehoe Forest from further degradation by feral ungulates, invasive weeds, and other threats, promoting research that will enhance protection efforts and contribute to better understanding on how to mitigate for climate change, and increasing outreach and education about native forests. The protection of Laupāhoehoe Forest as outlined in the Management Plan is a 15-year plan that is considered achievable based on historic and current funding resources and opportunities. The protection of an elevational gradient of native forest not only protects the forest, but also directly protects watershed and water supply, rare native plants, and habitats for endangered plant and animal species. Protecting the natural resources also protects cultural resources, as for many Native Hawaiians, they are one and the same. Protecting native forest maintains opportunities for traditional and customary practices, such as the gathering of certain plants for cultural purposes. Finally, the improvements to public access and the planned outreach and education efforts identified in the Management Plan further the State Plan’s objective to promote educational programs which enhance appreciation of Hawai‘i’s environmental resources.

Coastal Zone Management Program

Objectives and policies

HRC Chapter 205A requires all state and county agencies to enforce the coastal zone management

objectives and policies, as outlined in HRS § 205A-2. Ten areas are addressed:

- (1) recreational resources – provide coastal recreational opportunities accessible to the public;
- (2) historic resources – protect, preserve, and, where desirable, restore those natural manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture;
- (3) scenic and open space resources – protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources;
- (4) coastal ecosystems – protect valuable coastal ecosystems, including reefs, from disruption and minimize adverse impacts on all coastal ecosystems;
- (5) economic uses – provide public or private facilities and improvements important to the State's economy in suitable locations;
- (6) coastal hazards – reduce hazard to life and property from tsunamis, storm waves, stream flooding, erosion, subsidence, and pollution;
- (7) managing development – improve the development review process, communication, and public participation in the management of coastal resources and hazards;
- (8) public participation – stimulate public awareness, education, and participation in coastal management;
- (9) beach protection – protect the beaches for public use and recreation, and
- (10) marine resources – promote the protection, use, and development of marine and coastal resources to assure their sustainability.

Discussion

The Hawai‘i Coastal Zone Management Program completed the Federal consistency review of the Laupāhoehoe Forest Management Plan, and by letter dated April 8, 2016, concurred with the USFS determination that the Management Plan is consistent to the maximum extent practicable with the enforceable policies of the Hawai‘i Coastal Zone Management Program based on the following conditions:

1. The mitigation measures and best management practices proposed in this Final EA shall be fully implemented, and
2. The proposed activity shall be in compliance with the State Historic Preservation requirements pursuant to HRS Chapter 6E.

A discussion of the Laupāhoehoe Management Plan's consistency with the coastal zone management objectives follows:

Recreational resources: Laupāhoehoe Forest is a wilderness area, with limited existing legal public access. The Laupāhoehoe Forest is not adjacent to the shoreline or beach, and the proposed activities in the Management Plan are not anticipated to affect an ocean recreation area, swimming area, surf site, fishing area, or boating area.

The Management Plan proposes improvement of public access and recreational opportunities within Laupāhoehoe Forest that may positively impact recreational users. Specifically, the Management Plan identifies existing trails (Spencer and Peneki) for maintenance as primitive trails, and proposes the development of additional primitive trails 1) along the north fence line (upper boundary) from Mana Road to Blair Road, 2) connecting Spencer to Peneki and Peneki to Blair, 3) along the approximate route of the historic Maulua trail alignment, 4) from Mana Road to the Maulua trail, roughly parallel to the southern forest boundary and running through the proposed camping area at Shack Camp, and 5) from Blair Road to the south boundary, roughly following the FR and NAR boundary (between the 4,500 and 5,000 ft elevation). The Management Plan also identifies the development of primitive camping in the area of Shack Camp, consisting of up to ten tent sites, a management shelter that would be available for public use by reservation, self-contained composting toilets, and a covered open-sided shelter for cooking.

In addition, the Plan proposes that the State work with adjacent landowners to work on alternative access to the forest, pursue potential land acquisitions through fee simple purchase (which could eliminate private land barriers), and consider acquisition of long-term leases of state or private land adjacent to the forest when current leases expire.

Laupāhoehoe Forest is an existing State hunting area; the impact on hunting is anticipated to be minor to moderate as a result of the planned fenced conservation units (approximately 2,659 total acres), which will necessarily reduce the acreage available for game mammal hunting by 22%. The units were selected to protect areas of high-quality intact native forest while avoiding areas of high hunter activity, and the fencing will incorporate gates or step-overs to allow hunter and other forest user movement through the forest. Most of the proposed fencing is located at some distance from existing access points into Laupāhoehoe, on the forested area bordering Hakalau NWR. While there may be a moderate negative impact on individuals who travel distances within Laupāhoehoe Forest, off-trail and away from established access points, to preferred hunting locations within the proposed conservation units, the surrounding 78% of Laupāhoehoe Forest will remain an accessible alternative for hunting, as will hunting areas elsewhere on the island of Hawai‘i. To the general hunting community, the negative impact is anticipated to be minor, because the majority of Laupāhoehoe Forest will remain available for hunting (78%), as game animals will remain able to move freely from mauka to makai portions of Laupāhoehoe Forest, and because numerous opportunities for hunting exist elsewhere on the island for

licensed hunters, who make up less than 2% of the island's population.

Historic resources: Laupāhoehoe Forest is not within a designated historic or cultural district, is not listed or nominated to the Hawai‘i or National Register of Historic Places, and is not within or adjacent to a Hawaiian fishpond or historic settlement area. Portions of the forest have been surveyed for historic or archaeological resources, but the majority of the area is undeveloped land that has not been surveyed.

The development of a primitive hiking trail along the approximate historic route of the Maulua trail, from Mana Road to Maulua trail, and the development of primitive recreational camping facilities (designated tent camping sites, installation of open-sided shelter with roof catchment and firepit, composting toilets) at Shack Camp could impact the known historic features of Maulua trail or Shack Camp. The intent of the Management Plan is to protect these historic features, and planned mitigation measures to avoid damage or harm to these features, and enhance public appreciation of their historic value, include avoidance of documented features when siting the trail or tent camping sites, shelters and composting toilets, installation of interpretive signage regarding the historic features, and consultation with SHPD for additional mitigation measures and actions.

Should evidence of any unanticipated archaeological or cultural properties be encountered during construction, vegetation clearing or fence construction would immediately cease and the appropriate parties would be consulted immediately. Wherever possible, cultural resources would be avoided. Minimization options, in addition to site avoidance by relocating activities, would include data recovery, using either collection techniques or *in-situ* site stabilization protection.

Because of the limited number of documented features within Laupāhoehoe Forest, the low likelihood of undiscovered archaeological sites due to the elevation and dense rainforest setting, and the planned mitigation measures to avoid damage or harm to known or unanticipated resources, the negative impact on cultural and archaeological resources is expected to be minor. Over the long-term, minor positive impacts would be anticipated as a result of the increased documentation of the historic features associated with the ranching era and the protection of native forest from ungulate disturbance.

Consultation with SHPD pursuant to HRS § 6E-8 and NHPA § 106 will occur as necessary to confirm that proposed actions would have no adverse effect on the historic resources within Laupāhoehoe Forest, and mitigation requirements, if any, resulting from this consultation would be incorporated and implemented as appropriate.

Scenic and open space resources: Actions implemented under the Laupāhoehoe Forest Management Plan will not alter any natural landforms or existing public views and does not involve the construction of a multi-story structure, a structure visible from the nearest coastal roadway, or a structure in waters

seaward of the shoreline. It does involve undeveloped land (e.g., Laupāhoehoe Forest), but the Management Plan is specifically directed at the long-term protection of the natural and cultural resources found within Laupāhoehoe Forest.

Coastal ecosystems: Actions implemented under the Laupāhoehoe Forest Management Plan do not involve dredge and fill activities, the discharge or placement of material into a body of water or wetland, earthwork, grading, or grubbing, or the construction of waste treatment facilities.

Laupāhoehoe Forest is not within the Special Management Area or the Shoreline Setback Area or in close proximity to a reef or coral colonies, but it is within the State Conservation District and is within a State Forest Reserve and Natural Area Reserve. There are intermittent and perennial streams located within Laupāhoehoe Forest, and the forest provides habitat for endangered plants, forest birds, raptors, waterbirds, and bats. The Management Plan is specifically directed at the long-term protection of the natural and cultural resources found within Laupāhoehoe Forest, and fencing of the planned conservation units is for the long-term protection of the streams and habitat for endangered species.

Economic uses: Actions implemented under the Laupāhoehoe Forest Management Plan do not involve a harbor or port, is not a visitor industry facility or visitor industry related activity, and does not relate to commercial fishing or seafood production, energy production or transmission, or seabed mining. The Laupāhoehoe Forest does not include agricultural lands or lands designated for such use.

Coastal hazards: Laupāhoehoe Forest is not on or abutting a sandy beach, is not located within a potential tsunami inundation area, is not within a flood hazard area according to FEMA Flood Insurance Rate Maps, and is not within a subsidence hazard area.

Managing development: Implementation of the Laupāhoehoe Forest Management Plan is anticipated to require final approval of the NARS Commission (for actions within the NAR) and the BLNR, informal section 7 consultation with USFWS, and section 106 consultation with SHPD. These permits or consultations may be applied for or conducted after the environmental review process is complete. The proposed actions identified in the Laupāhoehoe Forest Management Plan conform with State and County land use designations for the site, because the actions are specifically directed towards the long-term protection and enhancement of the natural and cultural resources of this area. The public has been notified: the Management Plan was drafted in consultation with the Laupāhoehoe Advisory Council, twelve public meetings were held discussing draft plan content, and the Draft Management Plan has been posted on the Internet since April 2015.

Public participation: As noted above, information about the Laupāhoehoe Forest has been disseminated to the public and the public has been provided an opportunity to comment on the plan, both during development and currently through the environmental review process. A public informational meeting

was held on the Draft Management Plan in June 2015.

Beach protection: Actions identified in the Laupāhoehoe Forest Management Plan will not occur on or adjacent to a beach or within the shoreline setback area and are not anticipated to affect natural shoreline processes or public access to and along the shoreline.

Marine resources: Actions implemented under the Laupāhoehoe Forest Management Plan are not anticipated to involve or affect the use or development of marine or coastal resources and does not involve research of ocean processes or resources.

Section 6. Anticipated Determination under HRS Chapter 343 and Supporting Findings and Recommendations

Based on the discussion above, DLNR anticipates a **Finding of No Significant Impact** (FONSI) declaration. A final determination will be made by DLNR after consideration of the comments on the Draft EA, and a separate Decision Notice and FONSI will be prepared by the USFS as a separate document in accordance with NEPA.

In determining whether the proposed action will have a significant impact on the environment, DLNR considered the phases of the proposed action, the expected consequences, and the cumulative as well as the short and long-term effects of the action. In addition, DLNR specifically evaluated the implementation of the Management Plan under the following 13 significance criteria, as provided in HAR §11-200-12:

1. *Involves an irrevocable commitment to loss or destruction of any natural or cultural resource.*

Implementation of the Management Plan does not involve an irrevocable commitment to loss or destruction of any natural or cultural resources. Instead, the vision for Laupāhoehoe Forest is as an important research, education and demonstration forest where globally relevant activities are conducted to benefit the people and ecosystems of Hawai‘i, all Pacific islands, and the tropical world. Maintaining the integrity of the existing forest and the health and abundance of the native species that inhabit it is critical to the vision. Implementation of the Plan would benefit biological and watershed resources. Impacts to pig hunting, which is considered by some to be a contemporary cultural practice, would occur, but would be less than significant because of the proposed location and limited size (approximately 22% of the total area) of the planned fenced conservation units.

2. *Curtails the range of beneficial uses of the environment.*

Implementation of the Management Plan does not curtail the range of beneficial uses of the environment. The Management Plan outlines proposed management actions to protect natural and

cultural resources within Laupāhoehoe Forest while enhancing compatible human use. Opportunities for public enjoyment and outdoor recreation activities, such as hunting, educational visits, and hiking, will continue and potentially be enhanced through the proposed trail improvements.

3. *Conflicts with the State's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders.*

The proposed action is consistent with the environmental policies and guidelines established in HRS Chapter 344 and contributes to the conservation of threatened and endangered species, pursuant to HRS Chapter 195D. HRS §344-3 provides in part:

It shall be the policy of the State, through its programs, authorities, and resources to:

(1) Conserve the natural resources, so that land, water, mineral, visual, air and other natural resources are protected by controlling pollution, by preserving or augmenting natural resources, and by safeguarding the State's unique natural environmental characteristics in a manner which will foster and promote the general welfare, create and maintain conditions under which humanity and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of the people of Hawai'i. ...

HRS §344-4 provides in part:

In pursuance of the state policy to conserve the natural resources and enhance the quality of life, all agencies, in the development of programs, shall, insofar as practicable, consider the following guidelines: ...

(2) Land, water, mineral, visual, air, and other natural resources

(D) Encourage management practices which conserve and protect watersheds and water sources, forest, and open space areas; ...

Implementation of the Management Plan does not conflict with the state's long-term environmental policies or goals and guidelines as expressed in HRS Chapter 344; instead, it is entirely consistent with HRS Chapter 344.

The draft Hāmākua Community Development Plan identifies the importance of protecting the mauka forests from threats such as feral animals, invasive flora and fauna, and limited public access, and implementation of the Management Plan is entirely consistent with the vision and objectives of the Community Development Plan.

4. *Substantially affects the economic welfare, social welfare, or cultural practices of the*

community or State.

Implementation of the Management Plan does not negatively affect the economic welfare, social welfare or cultural practices of the community or State. While the economic and social welfare of the community and state will be positively impacted by the implementation of the Management Plan through long-term improvement in the health of native forests and watersheds, support of jobs and purchases associated with conservation management, and the encouragement of research related to tropical forestry, the impact is anticipated to be minor in the context of the island and State economy. Effects to pig hunting are not anticipated to be significant, and other subsistence resources associated with native forests in or near Laupāhoehoe Forest would be enhanced through conservation units selected to protect intact native forest. Healthy native forests offer recreational, cultural and watershed values that contribute to social welfare.

5. Substantially affects public health.

Implementation of the Management Plan would not substantially affect public health in any adverse way.

6. Involves substantial secondary impacts, such as population changes or effects on public facilities.

Implementation of the Management Plan is not anticipated to involve substantial secondary impacts (such as population changes or effects on public facilities).

7. Involves a substantial degradation of environmental quality.

Implementation of the Management Plan does not involve a substantial degradation of environmental quality; instead, the Management Plan outlines proposed management actions to protect natural and cultural resources within Laupāhoehoe Forest while enhancing compatible human use. Laupāhoehoe Forest will remain forested watershed, and under full implementation of the Management Plan, approximately 22% of the area, primarily composed of intact native forest, will be protected from further degradation attributable to feral ungulates. In addition, reforestation of previously grazed areas should improve wildlife and plant habitat in the upper elevations. The proposed action is expected to contribute to long-term protection of environmental quality associated with healthy native forests and watersheds.

8. Is individually limited but cumulatively has considerable effect upon environment or involves a commitment for larger actions.

Implementation of the Management Plan outlines a vision, objections, and specific management actions for the next 15 years. As proposed, it does not have considerable cumulative adverse effects nor does it

involve a commitment for larger actions. In general, cumulative impacts are beneficial.

9. Substantially affects a rare, threatened or endangered species, or its habitat.

Implementation of the Management Plan will protect rare, threatened and endangered plant and animal species and their habitat, as well as a portion of Federally designated critical habitat for six listed plant species. Best management practices associated with construction of conservation fencing, trail improvement, permitted research, educational activities, and development of primitive camping, management shelters, and helicopter landing zones will minimize negative short-term impacts to listed species and habitat (e.g., botanical and wildlife surveys along fence or trail corridors to identify rare plants, host plants for rare invertebrates, or roosting or nesting sites for native birds or the ‘ōpe‘ape‘a for protection). Rare species protocols (e.g., flagging plants, identifying buffer zones, etc.) would be implemented to avoid negative impacts to any rare plant species. Under full implementation of the Management Plan, approximately 22% of the area, primarily composed of intact native forest, will be protected from degradation attributable to feral ungulates. This protected area of native habitat would be anticipated to benefit listed forest birds (by protecting recovery habitat and minimizing the quantity of mosquito breeding areas) and rare plants (by protecting high-quality areas of intact native forest that either serves as current habitat or is appropriate for rare species outplanting).

10. Detrimentally affects air or water quality or ambient noise levels.

Implementation of the Management Plan is not anticipated to detrimentally affect air or water quality or ambient noise levels. Long-term benefits to water quality and quantity are expected as a result of protecting forest health.

11. Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

Implementation of the Management Plan does not affect nor is likely to suffer damage by being located in an environmentally sensitive area such as a floodplain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters. The Laupāhoehoe Forest is not located in or near any of the above-mentioned environmentally sensitive areas.

12. Substantially affects scenic vistas and view planes identified in county or State plans or studies.

Implementation of the Management Plan does not affect scenic vistas or viewplanes identified in county or State plans or studies and is anticipated to maintain or improve visual quality through maintenance of native forest.

13. Requires substantial energy consumption.

The proposed action does not require substantial energy consumption. Petroleum fuels would be used by equipment utilized for fence construction but this energy consumption is not anticipated to be substantial, especially in comparison to island-wide energy consumption.

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Appendix A. List of Agencies and Persons Consulted

The following agencies, organizations, and individuals were sent requests for comments on the Laupāhoehoe Forest Draft Management Plan in October 2015.

Federal

US Army Pohakuloa Training Area
USDA Natural Resources Conservation Service (NRCS)
NRCS Hilo Service Center
US Department of Transportation, Federal Highways Administration
USFWS – Hakalau NWR
USFWS – Pacific Islands NWR Complex
USFWS – Pacific Islands Office
USGS-Biological Resources Division
US National Park Service – Hawaii Volcanoes National Park
US Representative Mark Takai
US Representative Tulsi Gabbard
US Senator Mazie Hirono
US Senator Brian Schatz

State of Hawaii

Office of Governor David Ige
Office of Lieutenant Governor Shan Tsutsui
Department of Agriculture
Department of Business, Economic Development and Tourism – Land Use Commission
Department of Business, Economic Development and Tourism – Office of Planning
Department of Education, Hilo District
Department of Hawaiian Home Lands
Department of Hawaiian Home Lands – Hawaii District Supervisor
Department of Health
Department of Health – Environmental Planning Office
Department of Health – Clean Water Branch
DLNR – Division of Aquatic Resources
DLNR – Division of Conservation and Resource Enforcement
DLNR – Land Division
DLNR – Office of Conservation and Coastal Lands
DLNR – Division of State Parks

DLNR – Historic Preservation Division
Department of Transportation
Hawai‘i Island Burial Council
Natural Area Reserves System Commission
Office of Environmental Quality Control
Office of Hawaiian Affairs
Hawai‘i State Senator Gilbert Kahele, District 1
Hawai‘i State Senator Russell Ruderman, District 2
Hawai‘i State Senator Josh Green, District 3
Hawai‘i State Senator Lorraine Inouye, District 4
Hawai‘i State Representative Mark Nakashima, District 1
Hawai‘i State Representative Cliff Tsujii, District 2
Hawai‘i State Representative Richard Onishi, District 3
Hawai‘i State Representative Joy San Buenaventura, District 4
Hawai‘i State Representative Richard Creagan, District 5
Hawai‘i State Representative Nicole Lowen, District 6
Hawai‘i State Representative Cindy Evans, District 7
Laupāhoehoe Community Public Charter School
UH-Hilo
Office of Maunakea Management

County of Hawaii

Department of Parks and Recreation
Department of Research and Development
Planning Department
Police Department
Office of Mayor Billy Kenoi
Office of Council Member Valerie Poindexter, Hawai‘i County Council District 1
Office of Council Member Aaron Chung, Hawai‘i County Council District 2

Other Organizations

Big Island Invasive Species Committee
Bishop Museum
Conservation Council of Hawai‘i
CGAPS (Coordinating Group on Alien Pest Species)
Edith Kanaka‘ole Foundation
Hamakua Mushrooms
Hawai‘i Audubon Society
Hawai‘i Conservation Alliance
Hawai‘i County Native Hawaiian Chamber of Commerce
Hawai‘i Hunting Advisory Council

Hawai‘i Hunting Association
Hawai‘i Island Economic Development Board
Hawaiian Civic Club of Hilo
Hawaiian Electric Light Company (HELCO)
Kahea
Kamehameha Schools
Kukui‘ohiwai
Lana‘i Culture and Heritage Center
Laupāhoehoe Train Museum
Mauka and Makai Access Committee
Maulua Investments
Na Pua No‘eau
Parker Ranch
Pig Hunters of Hawai‘i
Plant Extinction Prevention Program
Sierra Club, Moku Loa Group
Mauna Kea Watershed Alliance
The Nature Conservancy of Hawai‘i
UH-Hilo Ka Haka ‘Ula O Ke‘elikolani
Volcano Rare Plant Facility

Individuals

Greg Asner
Paul Banko
Noah Beatty
Laura Brezinsky
Robert Bolick
James and Joyce Braun
Joel Bridgman
Lawrence E Butler and Frank Perry
Tom Carpenter
Debbie Chang
Alfred and Laverne Chow
David Clausnitzer
James Allen Costa
Michael Crosson
Rob Culbertson
Darrin Ray DeVries
Jeffrey Dias
Paul Souza Dias
Brigette Doneaux
Kimball Dougherty

Estanislao R Eugenio
Toribio and Violet Francisco TR
J.B. Friday
Robert L. Giuliani Trust
Trevor Gloor
Trevnia Wang and David Hasenstab
Mitchell and Jennifer Haynie
David Henry
Evelyn Hokama
Rick and Kristine Holasek
Derwin Ignacio
Michael and Claudia Ignacio
Kelly and Chandra Jose
Peter Jose
Richard Jose
Samuel Kaaua
Elliott Ke
Everett Ke
Christine Kornet
Julie Leialoha
Libraqua Trust
David Lovell
Dorothy and Mark Maggi/Snyder
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John and Marla McCall
Peter Mills
Susan Miyasaka
Alfred Nobriga Trust
David Nousekajian
Theo and Diana Ostermann
Reginald Page and Paige Breen
William and Louise Pape
Robert Patey
Lane Pestana
Alan Pestana
Tracy Pulido
George, Helene, & Joyce Robertson
Sandy Saemann
Jill Scofield
Enias Spencer
Glenn Spencer
Charles Spencer
Everett Spencer

Janet Stromberg
Robert Summers
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Margaret Wille
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Laupāhoehoe Advisory Council

Judi Steinman
Darus Ignacio
Pi'i La'eha
David Montgomerie
Alapaki Nahale-a
Robert Nishimoto
Jonathan Price
Scott Sanderson
Bill Stormont
Christopher Yuen

Appendix B. Public comments received during scoping period

Written comments were received from the following and are reproduced on the following pages:

Hawai‘i Department of Health, Clean Water Branch
Hawai‘i Department of Health, Environmental Planning Office
Hawai‘i Department of Land and Natural Resources, Division of Aquatic Resources
Hawai‘i Department of Transportation
Hawai‘i Office of Planning
US Fish and Wildlife Service
Hawai‘i County Police Department
Hawai‘i County Cultural Resources Commission



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
EMD/CWB

11020PJF.15

November 18, 2015

Ms. Tanya Rubenstein
Natural Area Reserves Project Coordinator
Department of Land and Natural Resources
1151 Punchbowl Street, Room 325
Honolulu, Hawaii 96813

Dear Ms. Rubenstein:

**SUBJECT: Pre-Consultation on Environmental Assessment (EA) for the
Laupahoehoe Forest Management Plan (Hawaii)
Island of Hawaii, Hawaii**

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated October 12, 2015, requesting comments on your project. The DOH-CWB has reviewed the subject document and offers these comments. Please note that our review is based solely on the information provided in the subject document and its compliance with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at: <http://health.hawaii.gov/epo/files/2013/05/Clean-Water-Branch-Std-Comments.pdf>.

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55).

For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form" or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee (\$1,000 for an individual NPDES permit or \$500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: <https://eha-cloud.doh.hawaii.gov/epermit/>. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form.

3. If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 835-4303) regarding their permitting requirements.

Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may **result** in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and HAR, Chapter 11-54.

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.
5. It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters. Project planning should:
 - a. Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources. What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects

natural ecosystems and traditional beneficial uses of State waters, like community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.

- b. Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g., minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.
- c. Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.
- d. Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.
- e. Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Particular consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.

If you have any questions, please visit our website at: <http://health.hawaii.gov/cwb/>, or contact the Engineering Section, CWB, at (808) 586-4309.

Sincerely,



ALEC WONG, P.E., CHIEF
Clean Water Branch

JF:ay

c: EPO [via e-mail noella.narimatsu@doh.hawaii.gov only]

DAVID Y. IGE
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

EPO 15-260

October 20, 2015

Ms. Tanya Rubenstein
Natural Area Reserves Project Coordinator
Department of Land and Natural Resources
1151 Punchbowl Street, Room 325
Honolulu, Hawaii 96813
Via email: Tanya.Rubenstein@hawaii.gov

Dear Ms. Rubenstein:

SUBJECT: Pre-Consultation on Environmental Assessment (PC EA) for the Laupahoehoe Forest Management Plan, Hawaii

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your PC EA to our office on October 19, 2015. Thank you for allowing us to review and comment on the proposed project. The PC EA was routed to the District Health Office on Hawaii. They will provide specific comments to you if necessary. EPO recommends that you review the standard comments and available strategies to support sustainable and healthy design provided at: <http://health.hawaii.gov/epo/landuse>. Projects are required to adhere to all applicable standard comments.

EPO also encourages you to examine and utilize the Hawaii Environmental Health Portal. The portal provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings. The Portal is continually updated. Please visit it regularly at: <https://eha-cloud.doh.hawaii.gov>

We request that you utilize all of this information on your proposed project to increase sustainable, innovative, inspirational, transparent and healthy design.

Mahalo nui loa,

A handwritten signature in blue ink, reading "Laura Leialoha Phillips McIntyre".

Laura Leialoha Phillips McIntyre, AICP
Program Manager, Environmental Planning Office

Attachment 1: OEQC Viewer - <http://eha-web.doh.hawaii.gov/oeqc-viewer/>

Attachment 2: U.S. EPA EJSCREEN 3 page report - <http://www2.epa.gov/ejscreen>

c: DHO Hawaii {via email only}

hawaii.gov Stay Connected

OEQC Viewer

Hybrid

Laupahoehoe

3 sites found

Results Filter

Show sites with no location

Laupahoehoe Forest Research Educ Center (DEA-AFNSI)
Environmental Assessment (Agency)

Hawaii Experimental Laupahoehoe Construction (FEA-FONSI)
Environmental Assessment (Agency)

Hawaii Experimental Tropical Forest Laupahoehoe Construction (DEA-AFNSI)
Environmental Assessment (Agency)

The map displays a satellite view of a mountainous region in Hawaii. Several streams are labeled: 'Ka'awili Stream', 'Laupahoehoe Stream', 'Kapa Stream', 'Ma'aloa Stream', and 'Ma'aloa Stream'. Two pink circular markers are placed on the map, indicating specific sites. The terrain is rugged with green vegetation and some cleared areas. The coastline is visible on the right side of the map.

Map data ©2015 Google Imagery ©2015, Data MBARI, DE Perjon & map engine

EJSCREEN Report

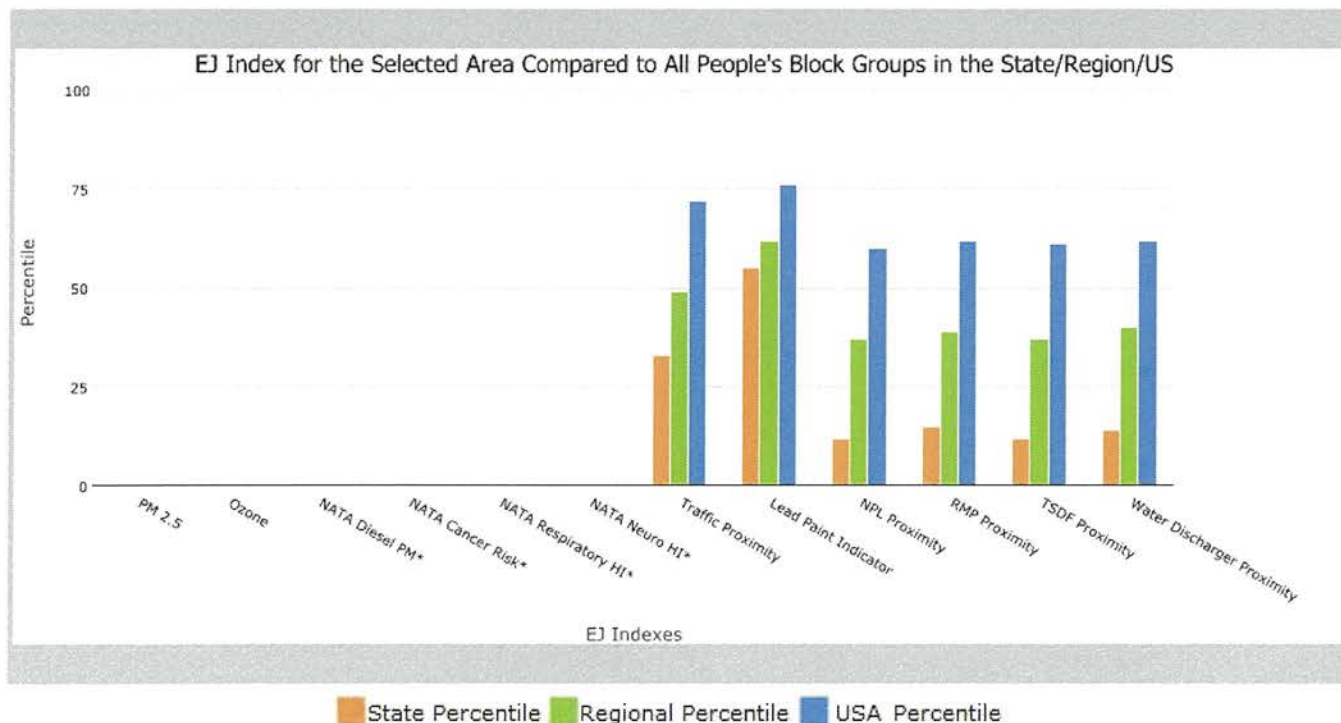


for 4 mile Ring Centered at 19.985459,-155.243979, HAWAII, EPA Region 9

Approximate Population: 1790

Laupahoehoe Micropolitan Area

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	N/A	N/A	N/A
EJ Index for Ozone	N/A	N/A	N/A
EJ Index for NATA Diesel PM*	N/A	N/A	N/A
EJ Index for NATA Air Toxics Cancer Risk*	N/A	N/A	N/A
EJ Index for NATA Respiratory Hazard Index*	N/A	N/A	N/A
EJ Index for NATA Neurological Hazard Index*	N/A	N/A	N/A
EJ Index for Traffic Proximity and Volume	33	49	72
EJ Index for Lead Paint Indicator	55	62	76
EJ Index for Proximity to NPL sites	12	37	60
EJ Index for Proximity to RMP sites	15	39	62
EJ Index for Proximity to TSDFs	12	37	61
EJ Index for Proximity to Major Direct Dischargers	14	40	62



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

for 4 mile Ring Centered at 19.985459,-155.243979, HAWAII, EPA Region 9

Approximate Population: 1790

Laupahoehoe Micropolitan Area



October 21, 2015

- + Digitized Point
- Buffer Area

1:144,448
0 1.25 2.5 5 mi
0 2 4 8 km
© Harris Corp., Earthstar Geographics LLC, Earthstar Geographics, SIO © 2015
Microsoft Corporation © 2010 NAVTEQ © AND

EJSCREEN Report



for 4 mile Ring Centered at 19.985459,-155.243979, HAWAII, EPA Region 9

Approximate Population: 1790

Laupahoehoe Micropolitan Area

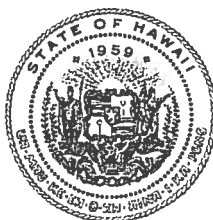
Selected Variables	Raw Data	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	N/A	N/A	N/A	9.95	N/A	9.78	N/A
Ozone (ppb)	N/A	N/A	N/A	49.7	N/A	46.1	N/A
NATA Diesel PM ($\mu\text{g}/\text{m}^3$) [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Cancer Risk (lifetime risk per million) [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Respiratory Hazard Index [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Neurological Hazard Index [*]	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	57	280	43	190	41	110	61
Lead Paint Indicator (% Pre-1960 Housing)	0.33	0.17	76	0.25	65	0.3	61
NPL Proximity (site count/km distance)	0.0029	0.092	7	0.11	0	0.096	0
RMP Proximity (facility count/km distance)	0.035	0.18	8	0.41	4	0.31	7
TSDF Proximity (facility count/km distance)	0.003	0.092	7	0.12	0	0.054	3
Water Discharger Proximity (facility count/km distance)	0.03	0.33	7	0.19	6	0.25	4
Demographic Indicators							
Demographic Index	46%	51%	32	46%	52	35%	71
Minority Population	78%	77%	39	57%	69	36%	84
Low Income Population	15%	25%	32	35%	21	34%	21
Linguistically Isolated Population	1%	6%	26	9%	21	5%	47
Population With Less Than High School Education	7%	10%	47	18%	32	14%	35
Population Under 5 years of age	7%	6%	63	7%	56	7%	60
Population over 64 years of age	12%	14%	43	12%	62	13%	52

* The National-scale Air Toxics Assessment (NATA) environmental indicators and EJ indexes, which include cancer risk, respiratory hazard, neurodevelopment hazard, and diesel particulate matter will be added into EJSCREEN during the first full public update after the soon-to-be-released 2011 dataset is made available. The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <http://www.epa.gov/ttn/atw/natamain/index.html>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

JEFFREY T. PEARSON
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

Date: November 16, 2015
DAR # 5197

MEMORANDUM

TO: Bruce S. Anderson, DAR Administrator *BSA*
DATE: *Nov. 17, 2015*
FROM: Troy Sakihara, Aquatic Biologist *TS BSA*
SUBJECT: Environmental Assessment for the Laupahoehoe Forest Draft Management Plan

Comment	Date Request	Receipt	Referral	Due Date
	October 12, 2015	October 15, 2015	October 29, 2015	November 30, 2015

Requested by: Tanya Rubenstein, Natural Area Reserves Project Coordinator
Hawaii Division of Forestry and Wildlife, Department of Land and Natural Resources

Summary of Proposed Project

Title: Laupahoehoe Forest Draft Management Plan, Environmental Assessment (Hawaii)

Project by: DOFAW, DLNR and USDA Forest Service Pacific Southwest Research Station's
Institute of Pacific Islands Forestry.

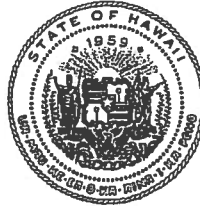
Location: State of Hawaii, County of Hawaii

Brief Description: This is a 15-year prospective draft management plan for the Laupahoehoe Forest to preserve and protect its natural resources, native biota and ecological integrity, as well as to enhance public use, education, recreation, outreach and research in this area. It was co-developed by DOFAW, USFS and the Laupahoehoe Advisory Council.

Comments: DAR has no major objections or concerns with the Draft Management Plan as the goals and objectives of this plan align with DAR's mission. The applicant is reminded that Best Management Practices are upheld during all phases of the proposed plan implementation to assure minimizing any and all negative impacts to the aquatic resources and stream habitat. Negative impacts of concern to DAR include, but are not limited to: erosion resulting from alterations to the stream bank; improvements to infrastructure, fencing, and trails; as well as impacts as a result of conducting surveys and/or any other activities that are conducted in close proximity to streams or any other aquatic habitat.

Thank you for providing DAR the opportunity to review and comment on the Draft Management Plan. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
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JEFFREY T. PEARSON
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING

FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS



October 12, 2015

TO: INTERESTED AGENCIES, ORGANIZATIONS and INDIVIDUALS

Re: Pre-Consultation on Environmental Assessment (EA) for the Laupāhoehoe Forest Management Plan (Hawai'i)

The Hawai'i Division of Forestry and Wildlife (DOFAW) of the Department of Land and Natural Resources (DLNR) and the USDA Forest Service (USFS) Pacific Southwest (PSW) Research Station's Institute of Pacific Islands Forestry (IPIF) are preparing an EA in compliance with Chapter 343, HRS for a Draft Management Plan for Laupāhoehoe Forest (map attached). The purpose of this letter is to share information about the project, request your assistance in identifying historic sites or cultural practices that might be impacted by the project, and invite you to share any issues that you wish to be addressed in the EA or any other concerns you may have.

JK
TS

The 12,343 acre (ac) (5,134 hectare (ha)) Laupāhoehoe Forest area consists of two state-managed parcels of land: 4,449 ac of state land designated as Forest Reserve (FR), and 7,894 ac of land designated as a Natural Area Reserve (NAR) (see attached map). Both of these programs are under DLNR-DOFAW and were established to protect native Hawaiian forest for current and future generations. In addition, the Laupāhoehoe Forest is designated as part of the Hawai'i Experimental Tropical Forest (HETF).

In 1992, the Hawai'i Tropical Forest Recovery Act authorized the establishment of the HETF to serve as a center for long-term research and a focal point for developing and transferring knowledge and expertise for the management of tropical forests. USFS-IPIF, based in Hilo, works cooperatively with the DLNR-DOFAW to coordinate research, management, and educational activities and to jointly develop and implement research and education, and management plans for the experimental forest.

The Draft Management Plan will be a guiding document for DLNR-DOFAW and the USFS-IPIF, outlining planned management actions over the next fifteen years and providing background information for why those actions were chosen. The overall goal is to protect, maintain, and enhance Laupāhoehoe Forest's unique natural, cultural, and geological resources while also enhancing compatible human uses. The proposed management actions include fence construction and pig removal to protect biological and water resources, invasive weed control, planting of rare native plants, wildfire prevention and response, public access and the development of interpretive trails for the public, continued research relevant to management and restoration of tropical forest

ecosystems, and encouragement of educational and outreach programs on tropical forests, conservation biology and natural resource management. The Draft Management Plan can be viewed at

http://dlnr.hawaii.gov/ecosystems/files/2013/07/DRAFT_Laupahoehoe_mngt_plan_04162015_small.pdf.

The Draft Management Plan was jointly developed by DOFAW, the USFS, and the Laupāhoehoe Advisory Council (LAC) through a collaborative planning process. Formed in December 2010, the LAC is a community-based advisory council that provides guidance and consultation to DOFAW and USFS on issues of management, research, and education in Laupāhoehoe Forest.

The EA will address topics including but not limited to: native plants and animals; invasive species; cultural resources; socioeconomic impacts; and public access. We invite your comments on any of these topics. We would especially appreciate your input on the following issues in the project area:

1. History, land use and cultural sites e.g., historic or archaeological sites, burials;
2. Traditional gathering practices in the project area – both past and present;
3. Cultural associations through traditions, legends, traditional use, or otherwise; and
4. Referrals of kūpuna who might be willing to share their cultural knowledge of the area.

This information will help us determine if there will be any impacts to cultural resources by proposed management actions, ensure that all potential cultural impacts are appropriately considered, and to prevent to the greatest extent possible any negative impact.

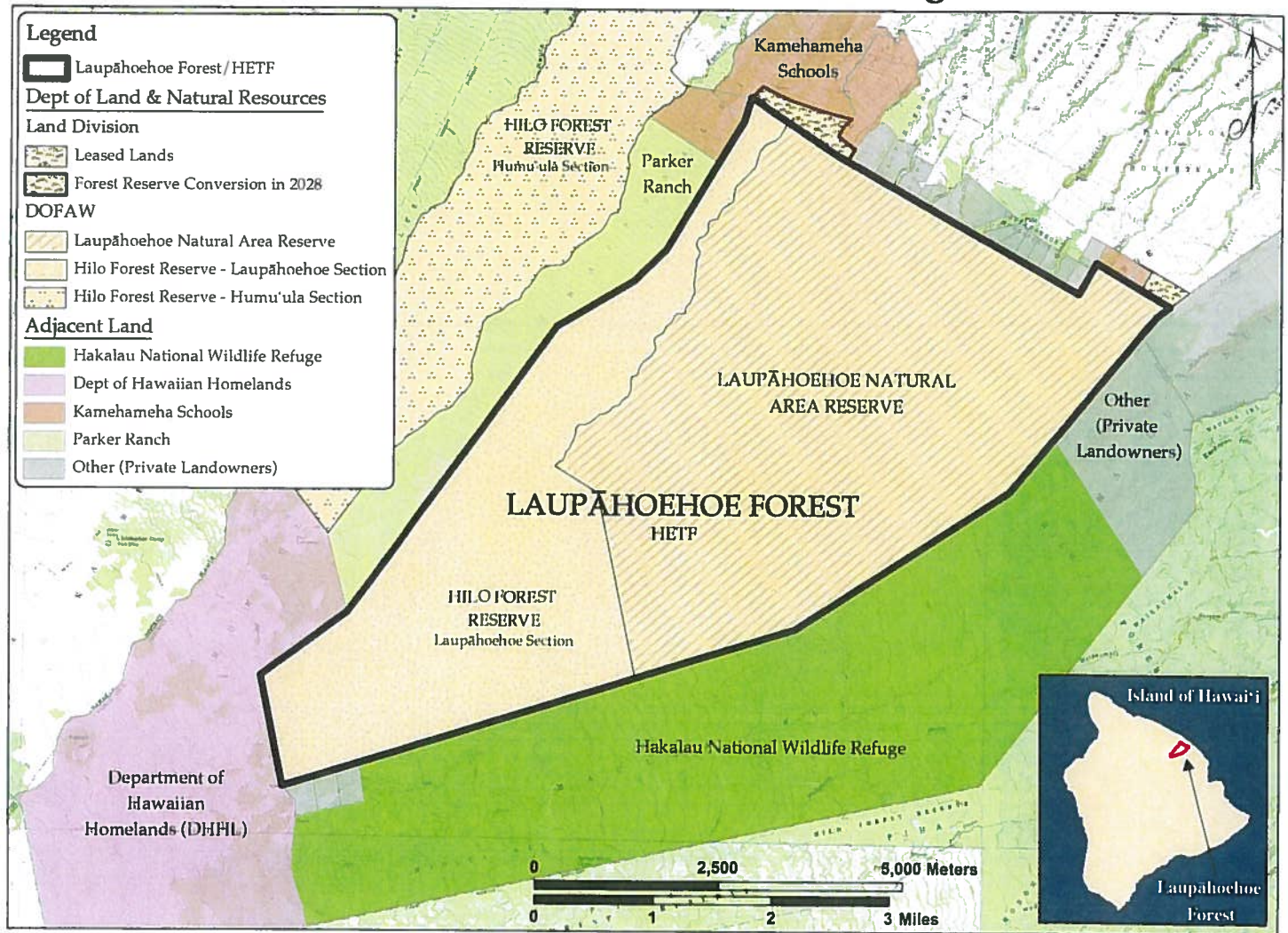
Please send comments on the project by November 30, 2015 and indicate whether you wish to receive a copy of the Draft EA. If you have any questions, contact me at 808-587-0027 or email: Tanya.Rubenstein@hawaii.gov or contact the HETF Manager, Mel Dean at 808-854-2651 or mkdean@hawaii.edu. Thank you in advance for your cooperation and for sharing your knowledge!

Sincerely,



Tanya Rubenstein, Natural Area Reserves Project Coordinator

Laupāhoehoe Forest Landowner Designation



DAVID Y. IGE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

FORD N. FUCHIGAMI
DIRECTOR

Deputy Directors
JADE T. BUTAY
ROSS M. HIGASHI
EDWIN H. SNIFFEN
DARRELL T. YOUNG

IN REPLY REFER TO:
STP 8.1884

October 30, 2015

TO: THE HONORABLE SUZANNE CASE, CHAIRPERSON
DEPARTMENT OF LAND AND NATURAL RESOURCES (DLNR)

ATTN: TANYA RUBENSTEIN
NATURAL AREA RESERVES PROJECT COORDINATOR
DIVISION OF FORESTRY AND WILDLIFE

FROM: *For* FORD N. FUCHIGAMI *J.T. Butay*
DIRECTOR OF TRANSPORTATION

SUBJECT: LAUPAHOEHOE FOREST MANAGEMENT PLAN
PRE-CONSULTATION ON ENVIRONMENTAL ASSESSMENT
LAUPAHOEHOE, NORTH HILO, HAWAII
TMK: (3) 3-7-001:002 AND 012

The subject plan is not expected to significantly impact the State Transportation facility. We do request that an electronic copy of the Draft Environmental Assessment be sent to us for our review and comments.

If there are any questions, please contact Mr. Norren Kato of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7976.

RECEIVED
2015 NOV - 6 AM 10:03
DEPT. OF LAND
& NATURAL RESOURCES
STATE OF HAWAII



OFFICE OF PLANNING STATE OF HAWAII

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

DAVID Y. IGE
GOVERNOR

LEO R. ASUNCION
ACTING DIRECTOR
OFFICE OF PLANNING

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: <http://planning.hawaii.gov/>

Ref. No. P-14946

November 16, 2015

To: Suzanne Case, Chairperson
Department of Land and Natural Resources

From: *Leo R. Asuncion* Leo R. Asuncion, Acting Director *Poly Th*

Attention: Tanya Rubenstein
Natural Area Reserves Project Coordinator

Subject: Pre-Consultation on an Environmental Assessment for the Laupāhoehoe Forest Management Plan

RECEIVED
2015 NOV 17 AM 10:34
DEPT. OF LAND
& NATURAL RESOURCES
STATE OF HAWAII

Thank you for the opportunity to provide comments on the pre-consultation request for the Draft Management Plan / Environmental Assessment proposed by the State of Hawaii, Department of Land and Natural Resources, Division of Forestry and Wildlife (DLNR-DOFAW) and the U.S. Department of Agriculture (USDA) Forest Service (USFS). The pre-consultation review material was transmitted to our office by letter dated October 12, 2015.

Per the instructions on the cover letter, once available, the Office of Planning (OP) would like an electronic copy of the Draft Environmental Assessment (Draft EA) on compact disc.

It is our understanding that the Laupāhoehoe Forest Management Plan seeks to comprehensively protect and preserve Laupāhoehoe Forest while enhancing public use and benefits through education, recreation, outreach, demonstration, and research activities. The proposed Draft EA will expand on the Draft Management Plan's overview of the history of the forest, describe the current condition of this Natural Area Reserve (NAR), and provide an overview of current management activities and agency missions.

The Laupāhoehoe Management Plan is the driving vision for the next fifteen years for this forest reserve. It provides guidance for stakeholders and recommendations on how to protect and preserve the area. The Management Plan documents current forest conditions and threats; serves as a management tool for work plans, staffing requirements, and budgets; and serves as a funding guidance so that DOFAW and the USFS can pursue additional resources.

The proposed Draft EA will provide further in-depth information on the role forests play in providing clean freshwater for downstream human and wildlife populations and in supporting healthy coastal marine resources, and recommend management actions.

The OP has reviewed the transmitted material and has the following comments to offer:

1. The Draft EA is needed to meet the requirements for Hawaii Revised Statutes (HRS) Chapter 343. Pursuant to the Hawaii Administrative Rules (HAR) § 11-200-10(4) – technical, economic, social, and environmental characteristics – this project must demonstrate that it is consistent with a number of state environmental, social, and economic goals and policies for land-use development.

OP provides technical assistance to state and county agencies in administering the statewide planning system in HRS Chapter 226, the Hawaii State Plan. The Hawaii State Plan provides goals, objectives, policies, and priority guidelines for growth, development, and the allocation of resources throughout the State. The Hawaii State Plan includes diverse objectives and policies of state interest including but not limited to the economy, agriculture, the visitor industry, federal expenditure, the physical environment, facility systems, socio-cultural advancement, climate change adaptation, and sustainability.

The Draft EA should include an analysis that addresses whether the proposed project conforms or is in conflict with the goals, objectives, policies, and priority guidelines listed in the Hawaii State Plan.

2. The coastal zone management area is defined as “all lands of the State and the area extending seaward from the shoreline to the limit of the State’s police power and management authority, including the U.S. territorial sea” see HRS § 205A-1 (definition of “coastal zone management area”).

HRS Chapter 205A requires all state and county agencies to enforce the coastal zone management (CZM) objectives and policies. The Draft EA should include an assessment as to how the proposed project conforms to the CZM objectives and its supporting policies set forth in HRS § 205A-2. The assessment on compliance with HRS Chapter 205A is an important component for satisfying the requirements of HRS Chapter 343. These objectives and policies include recreational resources, historic resources, scenic and open space resources, coastal ecosystems, economic uses, coastal hazards, managing development, public participation, beach protection, and marine resources.

3. The Draft EA should indicate the extent of involvement of the USDA-USFS in the management of this forest reserve/NAR. Our office will need this information to determine if the involvement of federal agencies, receipt of federal funding, or required permits will have an impact on the plans and programs that fall under the

jurisdiction of OP.

4. Pursuant to HAR § 11-200-10(6) – identification and summary of impacts and alternatives considered; in order to ensure that the Hamakua coastline remain protected, the negative effects of stormwater runoff originating from human land-based activities should be evaluated. The Draft EA should summarize the potential impact to nearshore marine resources and actions proposed to ensure the coastal ecosystem is protected and potential hazards mitigated.

The Draft Management Plan, in Table 2, page 24 lists the known streams and watershed basins of the Laupāhoehoe Forest. With these hydrological resources in mind, the Draft EA should evaluate current erosion controls in place for flood prone areas in the Laupāhoehoe Forest Reserve. This, as well as the marine water quality classification, should be considered when developing mitigation measures to protect the downslope coastal ecosystem.

The Draft Management Plan lists detailed information on the Laupāhoehoe Forest Reserve. It provides a historical background of the Laupāhoehoe Forest; provides a description of the current land use activities, existing infrastructure; provides a site description; and lists the cultural resources of the forest reserve. Furthermore, it details the existing threats to the natural and cultural resources; provides an overview of the existing management of the forest reserve; provides information on the proposed management program; and lists administrative background for the Hawaii Experimental Tropical Forest Cooperative Agreement planning group.

The Draft EA should also examine the cumulative impact on coastal resources from polluted runoff and sediment loss from planned development such as the USFS facility (listed on page 19 of the Draft Management Plan) currently under construction, as well as any future buildings, infrastructure improvements, fencing, public access trails, or roadways.

The Draft EA should examine the natural process of the land such as water resources, topographic contours, vegetated versus hardened surfaces, soil absorption rates, the connecting non-permeable roadways, public access trails within the reserve, and any existing drainage infrastructure that may directly connect the forest reserve/NAR to the coastline. Furthermore, it should account for land-based activities that will disturb the soil such as future infrastructure, facilities, and fencing within the nature reserve.

OP has a number of resources available to assist in the development of projects which

ensure sediment and stormwater control on land, thus protecting the nearshore environment. OP recommends consulting these guidance documents and stormwater evaluative tools when developing strategies to address polluted runoff. They offer useful techniques to keep soil and sediment in place and prevent contaminating nearshore waters, while considering the practices best suited for each project. The three evaluative tools that should be used during the design process include:

- Hawaii Watershed Guidance provides direction on site-appropriate methods to safeguard Hawaii's watersheds and implement watershed plans
[http://files.hawaii.gov/dbedt/op/czm/initiative/nonpoint/HI Watershed Guidance Final.pdf](http://files.hawaii.gov/dbedt/op/czm/initiative/nonpoint/HI_Watershed_Guidance_Final.pdf)
- Stormwater Impact Assessments can be used to identify and evaluate information on hydrology, stressors, sensitivity of aquatic and riparian resources, and management measures to control runoff, as well as consider secondary and cumulative impacts to the area
http://files.hawaii.gov/dbedt/op/czm/initiative/stormwater_impact/final_storm_water_impact_assessments_guidance.pdf
- Low Impact Development (LID), A Practitioners Guide covers a range of structural best management practices (BMP's) for stormwater control management, roadway development, and urban layout that minimizes negative environmental impacts
http://files.hawaii.gov/dbedt/op/czm/initiative/lid/lid_guide_2006.pdf

5. OP anticipates that the material presented in the Draft Management Plan will be incorporated into the Draft EA.

If you have any questions regarding this comment letter, please contact Josh Hekeia of our office at (808) 587-2845.



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850

DEC 04 2015

In Reply Refer To:
01EPIF00-2016-TA-0020

Ms. Tanya Rubenstein
Department of Lands and Natural Resources
1151 Punchbowl Street, Room 224
Honolulu, Hawaii 96813

Subject: Pre-consultation on the Environmental Assessment for the Laupahoehoe Forest Management Plan, Laupahoehoe, Hawaii

Dear Ms. Rubenstein:

Thank you for your letter dated October 12, 2015, requesting our comments on preparation of a Draft Environmental Assessment (DEA) on the Draft Laupahoehoe Management Plan (Plan). The Plan outlines management actions over the next 15 years with an overall goal to protect, maintain, and enhance Laupahoehoe Forest's unique natural, cultural, and geological resources, while also enhancing compatible human uses. The proposed management actions include fence construction and pig removal to protect biological and water resources, invasive weed control, planting of rare native plants, wildfire prevention, public access and improved trails, research, and public education.

As described below, we recommend that the DEA include discussions of the Plan's beneficial and adverse effects to species and critical habitat listed or designated under the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.). Overall, we feel that the most effective way to conserve listed species and their habitats in the wet forest habitats present at Laupahoehoe is to fence large landscape scale areas in order to protect forested habitats from the effects of ungulates. The detrimental effects of ungulates are well documented (Loope and Scowcroft 1985, Stone 1985, Stone et al. 1992, Loh and Tunison 1999). Ungulates in Hawaii damage native forest habitat and negatively affect rare species populations by foraging on native species, removing native understory vegetation, suppressing regeneration of native canopy species, and dispersing seeds of invasive alien plant species in their fur, hooves, and droppings.

Listed Plants

Surveys for rare plants in the Laupahoehoe Forest have occurred multiple times over the previous decades. We have reviewed our databases, including data compiled by the Hawaii Biodiversity and Mapping Program, to compare the locations of listed plants and their habitats



with management actions proposed in the Plan. Based on this data, it appears that most of management actions that would benefit listed plants will not occur where highest densities of listed plants were historically found. Our database shows that the highest density of listed plants have been found in the lower elevations of Laupahoehoe Forest; however, the proposed conservation units are primarily in the middle elevations. We understand that many extant plant locations in the lower elevations of the Laupahoehoe Forest are protected by smaller enclosures, however these small enclosures protect individuals and do not protect the native landscape as a whole or allow for adequate regeneration of the species to achieve recovery-size populations. The small enclosures will become small islands surrounded by degraded habitat, and will not lead to the recovery of listed plant populations or native habitats.

We recommend that the DEA document: 1) how many extant plant populations are found both in and out of the proposed conservation units, 2) how the proposed Plan will affect those populations, 3) how the Plan fits with recovery objectives for the listed plants, and 4) whether the Plan will provide for habitat that will serve for the recovery needs of the species (ie. be protected and managed).

Critical habitat

Critical habitat for six species is designated within the Laupahoehoe Forest. Beneficial effects to critical habitat from the Plan will come from the proposed conservation units, invasive species control and eradication, and forest restoration. Adverse effects to critical habitat from the Plan will come from ongoing habitat degradation from ungulates in unfenced areas of the Laupahoehoe Forest, and may increase in unfenced areas as the ungulates no longer have access to the fenced areas. Overall, the Plan proposes to fence relatively small areas of critical habitat, as shown in Table 1. We recommend that the DEA analyze the beneficial and adverse effects of the Plan on designated critical habitat.

Table 1. Approximate area of designated critical habitat (CH) within the Plan's proposed fenced units. LF: Laupahoehoe Forest

Species	Acres of CH within proposed fenced units	Acres (% of total) of CH in LF within proposed fenced units	Total number of CH units designated on Hawaii Island
<i>Clermontia peleana</i>	1,030	6,505 (16)	3
<i>Clermontia pyralaria</i>	0	0	2
<i>Cyanea platyphylla</i>	0	0	2
<i>Cyrtandra giffardii</i>	220	3,731 (6)	3
<i>Cyrtandra tintinnabula</i>	1,030	5,738 (18)	2
<i>Phyllostegia warshaueri</i>	23	3,840 (0.6)	2

Forest Birds

Laupahoehoe Forest provides habitat for endangered forest birds including the federally and state listed akiapoloau (*Hemignathus munroi*), akepa (*Loxops coccineus coccineus*), and Hawaiian creeper (*Oreomystis mana*). The highest quality habitat for native birds is found in upper elevations where temperatures are too cool for avian malaria and its mosquito vector. In addition, some species, such as the iiwi (*Vestiaria coccinea*), move seasonally between forests in the Hakalau National Wildlife Refuge (Refuge) and Laupahoehoe Forest. Climate change models predict a 2.6 degree warming in habitats that native forest birds occupy and this warming is

likely to have a serious effect on the future distribution of forest birds due to an increase in the distribution of avian disease (Fortini et al. 2015). The higher elevations of Laupahoehoe Forests are predicted to still provide habitat for native forest birds in the future (Fortini et al. 2015) and therefore protection of these higher elevation forests is critical for Hawaiian forest bird conservation. In addition, the higher elevation forests in Laupahoehoe are designated as Recovery Areas for listed forest birds (USFWS 2006). The Revised Recovery Plan for Hawaiian Forest Birds (USFWS 2006) states that protection, reforestation, fencing, and ungulate control are needed within the Recovery Areas of the Laupahoehoe parcel. Reducing or eliminating the detrimental effects of ungulates on native forests is a key component of forest bird recovery (USFWS 2006).

The higher elevations of Laupahoehoe Forest are not proposed for fenced protection and ungulate control in the Plan. We recommend the DEA address the effects the management proposed in the plan for the upper elevations of Laupahoehoe Forest will have on forest bird populations and recovery.

Invasive Species

The Plan was developed before the Rapid Ohia Death had been established on Hawaii Island. We recommend that the Plan include biosecurity measures and adaptive management efforts to address this new threat.

Laupahoehoe Natural Area Reserve

The Laupahoehoe Forest covered by the Plan includes the Laupahoehoe Natural Area Reserve (NAR). The NAR System was established to preserve Hawaii's unique ecosystems in as unmodified a condition as possible. The Service feels that this mission is incompatible with ungulate populations remaining in unfenced habitat. The Plan only proposed to fence a small portion of the Laupahoehoe NAR. We recommend the DEA address the effects to habitats within the NAR from ongoing ungulate degradation.


Summary

We recognize that this Plan is a guiding document for the next 15 years, and therefore is a first step in the long-term planning for the Laupahoehoe Forest. We also recognize the challenges inherent in developing a comprehensive management plan for a multiple-use forest, and commend the Department of Lands and Natural Resources, U.S. Forest Service, and the Laupahoehoe Advisory Committee for their efforts in developing this Plan. We anticipate the Plan will provide an overall benefit to native species and their habitats.

However, we recommend that the proposed fenced conservation units be expanded to include more of the NAR, critical habitat units, known rare plant locations, and forest bird habitat. Expanding the conservation units to include upper elevation forest bird habitat and lower elevation NAR and rare plant habitat will create a conservation unit that protects the full elevational gradient of habitats in Laupahoehoe, and also will increase connectivity with the Refuge.

Thank you for the opportunity to provide comments on preparation of the DEA and the Plan. If you have questions regarding this letter, please contact Rachel Rounds, Fish and Wildlife Biologist, (phone: 808-792-9400, email: Rachel_Rounds@fws.gov).

Sincerely,


acting for
Michelle Bogardus
Island Team Manager
Maui Nui and Hawaii Islands

Literature cited

Fortini, L. B., A.E. Vorsino, F.A. Amidon, E.H. Paxton, and J.D. Jacobi. 2015. Large scale range collapse of Hawaiian forest birds under climate change and the need 21st century conservation options. PLoS ONE 10(10): e0140389. doi:10.1371/journal.pone.0140389

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(USFWS) U.S. Fish and Wildlife Service. 2006. Revised Recovery Plan for Hawaiian Forest Birds. Portland, OR.

William P. Kenoi
Mayor



Harry S. Kubojiri
Police Chief

Paul K. Ferreira
Deputy Police Chief

County of Hawai'i

POLICE DEPARTMENT

349 Kapi'olani Street • Hilo, Hawai'i 96720-3998
(808) 935-3311 • Fax (808) 961-2389

October 28, 2015

Ms. Tanya Rubenstein
Natural Area Reserves Coordinator
State of Hawaii, Department of Land and Natural Resources
Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, HI 96813

Dear Ms. Rubenstein:

**Subject: Pre-Consultation on Environmental Assessment (EA) for the
Laupāhoehoe Forest Management Plan (HI)**

Staff, upon reviewing the provided documents, does not have any comments or public safety concerns. We are not requesting a copy of the Draft EA when completed.

Thank you for allowing us the opportunity to comment.

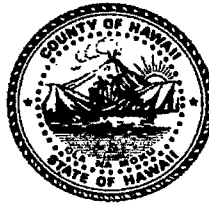
If you have any questions, please contact Captain Andrew Burian, Commander of the Hāmākua District, at (808) 775-7533.

Sincerely,


HENRY J. TAVARES JR.
ASSISTANT POLICE CHIEF
AREA I OPERATIONS BUREAU

AB:lli
150683

William P. Kenoi
Mayor



Deborah Chang, Chair
Ke'ala Lee Loy, Vice Chair
Ronald Dela Cruz
Lily Dudoit
Nicole Lui
Barbara Meheula
Boone Morrison
Christine Wada

County of Hawai'i

PLANNING DEPARTMENT

CULTURAL RESOURCES COMMISSION

Aupuni Center • 101 Pauahi Street, Suite 3 • Hilo, Hawai'i 96720
Phone (808) 961-8288 • Fax (808) 961-8742

January 22, 2016

Ms. Tanya Rubenstein
Natural Area Reserves Project Coordinator
Department of Land and Natural Resources, Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, HI 96813

Dear Ms. Rubenstein:

SUBJECT: Pre-Consultation on Environmental Assessment (EA) for the Draft Laupāhoehoe Forest Management Plan

TMKs: (3) 3-7-001:002 and 012, Laupāhoehoe, North Hilo, Hawai'i

The Hawai'i County Cultural Resources Commission (CRC) reviewed the subject Draft Management Plan for Laupāhoehoe Forest at their January 13, 2016 meeting, and thanks you for the opportunity to comment. The CRC was appreciative of the attendance of Mr. Nicholas Agorastos and Ms. Tabettha Block, who represented the Draft Management Plan and was able to answer questions from the commissioners.

The CRC understands that the Draft Management Plan is to be a guiding document for the management of the 12,342 acre Laupāhoehoe Forest over the next fifteen years. Proposed management actions include fence construction, pig removal, weed control, outplanting of native plants, wildfire prevention and response, public access and the development of trails, continued research, and encouragement of education and outreach programs. While Mr. Agorastos and Ms. Block answered many of the questions that the commissioners had regarding the Draft Management Plan and the preparation of the draft EA, we are listing the comments below as record of the consultation.

Comments were as follows:

- P. 15: It is mentioned that gathering for Native Hawaiian religious and customary gathering rights requires an HETF permit. Please elaborate on the procedure for applying for a permit, considerations made when granting an HETF permit (i.e. non-commercial,

limits on quantity and species, number of individuals applying), the permitting authority (including length of time it takes to review and issue a permit), permit enforcement, and how the permit is in alignment with the protection of Hawaiian rights as identified under judicial decisions.

- P. 17: No mention is made of the Waipunalei Trail. Maly & Maly call it the Waipunalei-Laupāhoehoe trail. Please include it in the list and maps of trails within the Laupāhoehoe Forest and be on alert for traditional features made of stone that would be remnants of the historic trail. According to the Maly study, there is an 1856 reference to road work done on this trail, which may make it subject to the Highways Act of 1892, as currently administered by DLNR - Nā Ala Hele.
- P. 17: The draft EA should identify the location of historic trails on the property to avoid blocking passage on them when building fence lines.
- P. 20: The Shack Camp is already being used as a staging area for activities in the upper forest and is planned as a "primitive camping area" for the public in the future. Has any historic resources or archaeological inventory or preservation plan been done to identify what remains of this historic site and area to ensure that its historic record is preserved? This should be done before further human impacts occur and advice from State Historic Preservation Division (SHPD) and the CRC sought regarding management of the historic and cultural resources.
- P. 36: Shack Camp should be included in the listing of archaeological and historic sites.
- P. 64: Under "Cultural Resources" it should be clear to permittees, researchers, staff, and the public that any inadvertently discovered cultural resources, including prehistoric artifacts, stone platforms, cairns, caves etc. (not just burials) should be reported immediately. This should be included as a condition in all permits.
- Pp. 79-82: There are no planned actions for archaeological survey and/or historic preservation of Shack Camp or the Maulua and Waipunalei trails. This should be part of the plan. We note that the need is generally acknowledged on p. 55 as a proposed action under "Research" with no specific time frame. Such surveys should be done early before ground disturbance inadvertently damages the sites.
- The County of Hawai'i recently acquired public access from Uweki Road (Maulua) along the northern property boundary of TMK: (3) 3-4-002:004 mauka to the Laupāhoehoe Forest Reserve as part of a subdivision action on the stated parcel. This access should be included in the public access locales described in the management document. A copy of the access agreement can be provided upon request.
- The County of Hawai'i General Plan is the policy document for the long range comprehensive development of the island of Hawai'i. In part, the purpose of the General Plan is to provide a framework for regulatory decisions, capital improvement priorities, acquisition strategies, and other pertinent government programs within the County organization and coordinated with State and Federal programs. The draft EA should evaluate the project with respect to the General Plan. Other than the goals/policies already identified in the draft management plan on Table 1 (p. 13), please also consider

County of Hawai'i General Plan goals and policies relating to historic sites, specifically policies 6.3(e) and 6.3(k).

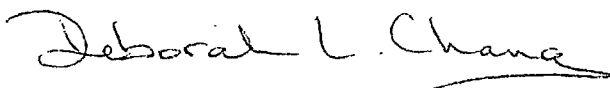
- There appear to be several historic sites on the property including the Dr. David Douglas monument, remnants of the Kūka'iau Ranch, and at least a few historic trails. An evaluation of the properties' significance for inclusion on the State (HAR 13-198) or National Register of Historic Places (36 CFR Part 60) should also be made.
- The proposed management plan (beginning on p. 45) should include any plans for the treatment and management of the known historic properties. As there is a good probability that there are extant historic and cultural properties on the subject lands that have yet to be identified, the management plan should also include a process by which these resources can be identified, communicated to forestry management, and incorporated into the plan such that the resources can be managed properly.

In response to your request for contact information for individuals or organizations that may be willing to share their cultural knowledge of the area, the following have been identified:

- Hui Mālama i ke Ala 'Ūlili; <http://www.alaulili.com/> or kealaulili@gmail.com
- Leon No'eau Peralto; leon.peralto@gmail.com
- Jeffrey Dias; phone (808) 776-1273
- Waltham Johansen; P.O. Box 72, Pa'auilo, HI 96776

Mahalo for allowing us the opportunity to provide pre-consultation comments for the preparation of a draft EA for the Laupāhoehoe Forest Management Plan, we look forward to review of the draft. Should you have any questions regarding the consultation, please contact CRC staff member Lucas Mead at (808) 961-8140 or at Lucas.Mead@hawaiicounty.gov.

Me ka pono,



DEBORAH CHANG, Chairperson
Hawai'i County Cultural Resources Commission

LM:klt

\\coh33\planning\public\wpwin60\Cultural Resources Commission\Projects\Laupahoehoe Forest Management Plan\LFMP Pre draft
EA - CRC to DOFAW.doc

cc via email: Hawai'i County Cultural Resources Commission
Nicholas Agorastos nicholas.v.agorastos@hawaii.gov
Tabetha Block tabethaablock@fs.fed.us

Appendix C. Comments received on Draft EA and Agency Response

Written comments on the Draft EA were received from the following agencies, organizations, and individuals. Copies of the comment letters, along with copies of DOFAW's response, are reproduced on the following pages:

US Fish and Wildlife Service
Hawai'i Department of Health, Clean Water Branch
Hawai'i Department of Health, Environmental Planning Office
Hawai'i Department of Land and Natural Resources, Division of Aquatic Resources
Hawai'i Department of Land and Natural Resources, Office of Conservation and Coastal Lands
Hawai'i Office of Environmental Quality Control
Hawai'i County Police Department
Hawai'i County Planning Department
Hawai'i County Cultural Resources Commission
Conservation Council for Hawai'i
Deborah L. Chang
Patrick Conant
Thomas Young



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850



In Reply Refer To:
01EPIF00-2016-TA-0020

Ms. Tanya Rubenstein
Department of Lands and Natural Resources
1151 Punchbowl Street, Room 224
Honolulu, Hawaii 96813

APR 01 2016

Subject: Comments on the Draft Environmental Assessment for the Laupahoehoe Forest Management Plan, Laupahoehoe, Hawaii

Dear Ms. Rubenstein:

Thank you for your letter dated March 8, 2016, requesting our comments on the Draft Environmental Assessment (DEA) for the Laupahoehoe Draft Management Plan (Plan). We also want to thank State of Hawaii, Division of Forestry and Wildlife, staff for taking U.S. Fish and Wildlife Service staff to the Laupahoehoe Forest to conduct a site visit on February 11, 2016, and discuss the Plan.

The Plan outlines management actions over the next 15 years with an overall goal to protect, maintain, and enhance Laupahoehoe Forest's unique natural, cultural, and geological resources, while also enhancing compatible human uses. The proposed management actions include fence construction and pig removal to protect biological and water resources, invasive weed control, planting of rare native plants, wildfire prevention, public access and improved trails, research, and public education. We previously provided comments to assist you in the development of the DEA in a letter dated December 4, 2015 (Service File 2016-TA-0020).

Conservation Units

As mentioned in our previous letter, we feel that the most effective way to conserve listed species and their habitats in the wet forest habitats present at Laupahoehoe is to fence large landscape scale areas in order to protect forested habitats from the effects of ungulates. The detrimental effects of ungulates are well documented (Loope and Scowcroft 1985, Stone 1985, Stone et al. 1992, Loh and Tunison 1999). Ungulates in Hawaii damage native forest habitat and negatively affect rare species populations by foraging on native species, removing native understory vegetation, suppressing regeneration of native canopy species, and dispersing seeds of invasive alien plant species in their fur, hooves, and droppings. Therefore, we recommend that the proposed fenced conservation units be expanded to include more of the Natural Area Reserve, critical habitat units, known rare plant locations, and forest bird habitat. This will also increase connectivity with the Hakalau Forest National Wildlife Refuge.

Compliance with section 7 of the Endangered Species Act

We anticipate that the finalization of the Plan will have no effect on listed species or critical habitat; however, implementation of specific actions outlined in the plan may have an effect on listed species or critical habitat. We recommend that the U.S. Forest Service (or other Federal agency which is conducting, permitting, or funding specific actions) initiate a section 7 consultation with the Service for those actions it funds or permits prior to implementation of the specific action (ie. construction of a fence). Because the actions will occur over the next 15 years, this will avoid the need to reinitiate consultation if the action has changed or if new information about listed species or critical habitat is available.

Summary

We recognize that this Plan is a guiding document for the next 15 years, and therefore is a first step in the long-term planning for the Laupahoehoe Forest. We also recognize the challenges inherent in developing a comprehensive management plan for a multiple-use forest, and commend the Department of Lands and Natural Resources, U.S. Forest Service, and the Laupahoehoe Advisory Committee for their efforts in developing this Plan. We anticipate the Plan will provide an overall benefit to native species and their habitats.

Thank you for the opportunity to provide comments on preparation of the DEA and the Plan. If you have questions regarding this letter, please contact Rachel Rounds, Fish and Wildlife Biologist, (phone: 808-792-9400, email: Rachel_Rounds@fws.gov).

Sincerely,



Michelle Bogardus
Island Team Manager
Maui Nui and Hawaii Islands

Literature cited

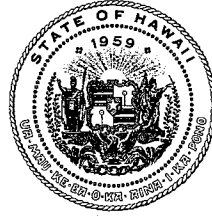
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DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

Ms. Michelle Bogardus
Island Team Manager, Maui Nui and Hawaii Islands
U.S. Fish and Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, HI 96850

Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan
01EPIF00-2016-TA-0020

Dear Ms. Bogardus:

Thank you for the letter dated April 1, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate your review and acknowledge your recommendation that the proposed conservation units be expanded to include more of the Natural Area Reserve, critical habitat units, known rare plant locations, and forest bird habitat. The Management Plan reflects proposed management actions that we believe can realistically be implemented over the next 15 years, based on our best estimates of funding and resources available over that time period. Currently, approximately 35 acres within the Laupāhoehoe Forest is fenced and the Management Plan proposes to greatly expand the protected area to approximately 2,659 acres, prioritizing areas of intact high quality native forest. If we are able to fully implement the Management Plan over the next 15 years, we anticipate future Management Plans (2031 and beyond) may identify opportunities to expand the conservation units.

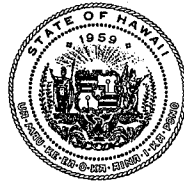
We also appreciate your statement that finalization of the Management Plan will have no effect on listed species or critical habitat but that implementation of specific actions may have an effect, and acknowledge your recommendation that the US Forest Service (or other Federal agency which may conduct, permit, or fund specific actions) initiate a section 7 consultation with the USFWS prior to implementation of that specific action.

The Final Environmental Assessment will be available for your review when published. Thank you again for your comments and for your participation in the environmental review process.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Smith', is positioned over the word 'Sincerely,'.

David Smith
Administrator, Division of Forestry and Wildlife



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
EMD/CWB

03048PCTM.16

March 18, 2016

Ms. Tanya Rubenstein
Project Coordinator
Department of Land and Natural Resources
Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, Hawaii 96813

Dear Ms. Rubenstein:

**SUBJECT: Comments on the Draft Environmental Assessment (DEA) for the
Laupahoehoe Forest Draft Management Plan
TMK: (3) 3-7-001:002, (3) 3-7-001:012
Hilo, Island of Hawaii, Hawaii**

The Department of Health (DOH), Clean Water Branch (CWB), acknowledges receipt of your letter, dated March 8, 2016, requesting comments on your project. The DOH-CWB has reviewed the subject document and offers these comments. Please note that our review is based solely on the information provided in the subject document and its compliance with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at: <http://health.hawaii.gov/epo/files/2013/05/Clean-Water-Branch-Std-Comments.pdf>

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55).

For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for a NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form" or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee (\$1,000 for an individual NPDES permit or \$500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: <https://eha-cloud.doh.hawaii.gov/epermit/>. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form.

3. If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the Army Corp of Engineers, Regulatory Branch (Tel: 835-4303) regarding their permitting requirements.

Pursuant to Federal Water Pollution Control Act [commonly known as the "Clean Water Act" (CWA)], Paragraph 401(a)(1), a Section 401 Water Quality Certification (WQC) is required for "[a]ny applicant for Federal license or permit to conduct any activity including, but not limited to, the construction or operation of facilities, which may **result** in any discharge into the navigable waters..." (emphasis added). The term "discharge" is defined in CWA, Subsections 502(16), 502(12), and 502(6); Title 40 of the Code of Federal Regulations, Section 122.2; and Hawaii Administrative Rules (HAR), Chapter 11-54.

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.
5. It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters. Project planning should:
 - a. Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources. What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects

natural ecosystems and traditional beneficial uses of State waters, like community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.

- b. Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g. minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.
- c. Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.
- d. Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.
- e. Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Particular consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.

If you have any questions, please visit our website at: <http://health.hawaii.gov/cwb/>, or contact the Engineering Section, CWB, at (808) 586-4309.

Sincerely,



ALEC WONG, P.E., CHIEF
Clean Water Branch

c: EPO [via e-mail only]

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
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JEFFREY T. PEARSON, P.E.
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CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAIHOLAWA ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

Mr. Alec Wong, P.E.
Chief, Clean Water Branch
Department of Health
PO Box 3378
Honolulu, HI 96801-3378

Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan
03048PCTM.16

Dear Mr. Wong:

Thank you for the letter dated March 18, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate your review, your comments regarding compliance with HAR Chapters 11-54 and 11-55, and your references to the Clean Water Branch's standard comments found at <http://health.hawaii.gov/epo/files/2013/05/Clean-Water-Branch-Std-Comments.pdf>. The Laupāhoehoe Forest Management Plan will be implemented over the next 15 years to support long-term protection of the native forest and watershed and the unique natural resources found within this area. As such, it is our intent that all planned forest management will comply with State law as outlined in HAR Chapters 11-54 and 11-55 and will have the overall result of protecting, restoring and sustaining water quality.

The Final Environmental Assessment will be available for your review when published. Thank you again for your comments and for your participation in the environmental review process.

Sincerely,


David Smith
Administrator, Division of Forestry and Wildlife



**STATE OF HAWAII
DEPARTMENT OF HEALTH**

P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

EPO 16-084

March 11, 2016

Ms. Christen Mitchell
Anden Consulting
2812-B Kalihi Street
Honolulu, Hawaii 96819
Email: Mitchell@anden.consulting

Dear Ms. Mitchell:

**SUBJECT: Draft Environmental Assessment (DEA) for Laupahoehoe Forest Management Plan
North Hilo, Hawaii
TMK: (1) 3-7-001:002, (3) 3-7-001:012**

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your DEA to our office via the OEQC link:

http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Hawaii/2010s/2016-03-08-HA-5B-DEA-Laupahoehoe-Forest-Mgmt-Plan.pdf

EPO strongly recommends that you review the standard comments and available strategies to support sustainable and healthy design provided at: <http://health.hawaii.gov/epo/landuse>. Projects are required to adhere to all applicable standard comments. EPO has recently prepared draft Environmental Health Management Maps for each county. They are online at: <http://health.hawaii.gov/epo/egis>

We suggest you review the requirements for the National Pollutant Discharge Elimination System (NPDES) permit. We recommend contacting the Clean Water Branch at (808) 586-4309 or cleanwaterbranch@doh.hawaii.gov after relevant information is reviewed at:

1. <http://health.hawaii.gov/cwb>
2. <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/standard-npdes-permit-conditions>
3. <http://health.hawaii.gov/cwb/site-map/clean-water-branch-home-page/forms>

EPO also suggests that the Hazard Evaluation and Emergency Response (HEER) Office's Site Discovery and Response (SDAR) Section be contacted. The SDAR section protects human health and the environment by identifying, investigating, and remediating sites contaminated with hazardous substances (non-emergency site investigations and cleanup). The HEER Office's SDAR Section can be contacted at: (808) 586-4249. For historical maps on lands where sugarcane was grown see: <http://health.hawaii.gov/epo/egis/sugarcane>

EPO encourages you to examine and utilize the Hawaii Environmental Health Portal. The portal provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings. The Portal is continually updated. Please visit it regularly at: <https://eha-cloud.doh.hawaii.gov>

Ms. Christen Mitchell
Page 2
March 11, 2016

You may also wish to review the draft Office of Environmental Quality Control (OEQC) viewer at: <http://eha-web.doh.hawaii.gov/oeqc-viewer> This viewer geographically shows where previous Hawaii Environmental Policy Act (HEPA) {Hawaii Revised Statutes, Chapter 343} documents have been prepared.

In order to better protect public health and the environment, the U.S. Environmental Protection Agency (EPA) has developed a new environmental justice (EJ) mapping and screening tool called EJSCREEN. It is based on nationally consistent data and combines environmental and demographic indicators in maps and reports. EPO encourages you to explore, launch and utilize this powerful tool in planning your project. The EPA EJSCREEN tool is available at: <http://www2.epa.gov/ejscreen>

We request that you utilize all of this information on your proposed project to increase sustainable, innovative, inspirational, transparent and healthy design.

Mahalo nui loa,



Laura Leialoha Phillips McIntyre, AICP
Program Manager, Environmental Planning Office

LM:nn

Attachment 1: EPO Draft Environmental Health Management Map
Attachment 2: Recycled Water Use Map
Attachment 3: EPO Historic Sugarcane Map
Attachment 4: OEQC Viewer Map of Area
Attachment 5: U.S. EPA EJSCREEN Report

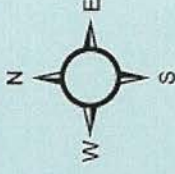
c: Tanya Rubenstein, DLNR {via email: tanya.rubenstein@hawaii.gov}
DOH: DHO HI, SDWB, CWB {via email only}

LEGEND

- AIR QUALITY MONITORING SITES
- ▲ ACTIVE LANDFILLS
- ★ WATER QUALITY MONITORING SITES
- PERENNIAL STREAMS
- NON-PERENNIAL STREAMS
- 3-MILE NAUTICAL BOUNDARY
- A CLASS WATER QUALITY
- AA CLASS WATER QUALITY
- HOUSE DISTRICTS
- SENATE DISTRICTS
- AGRICULTURAL
- CONSERVATION
- RURAL
- URBAN



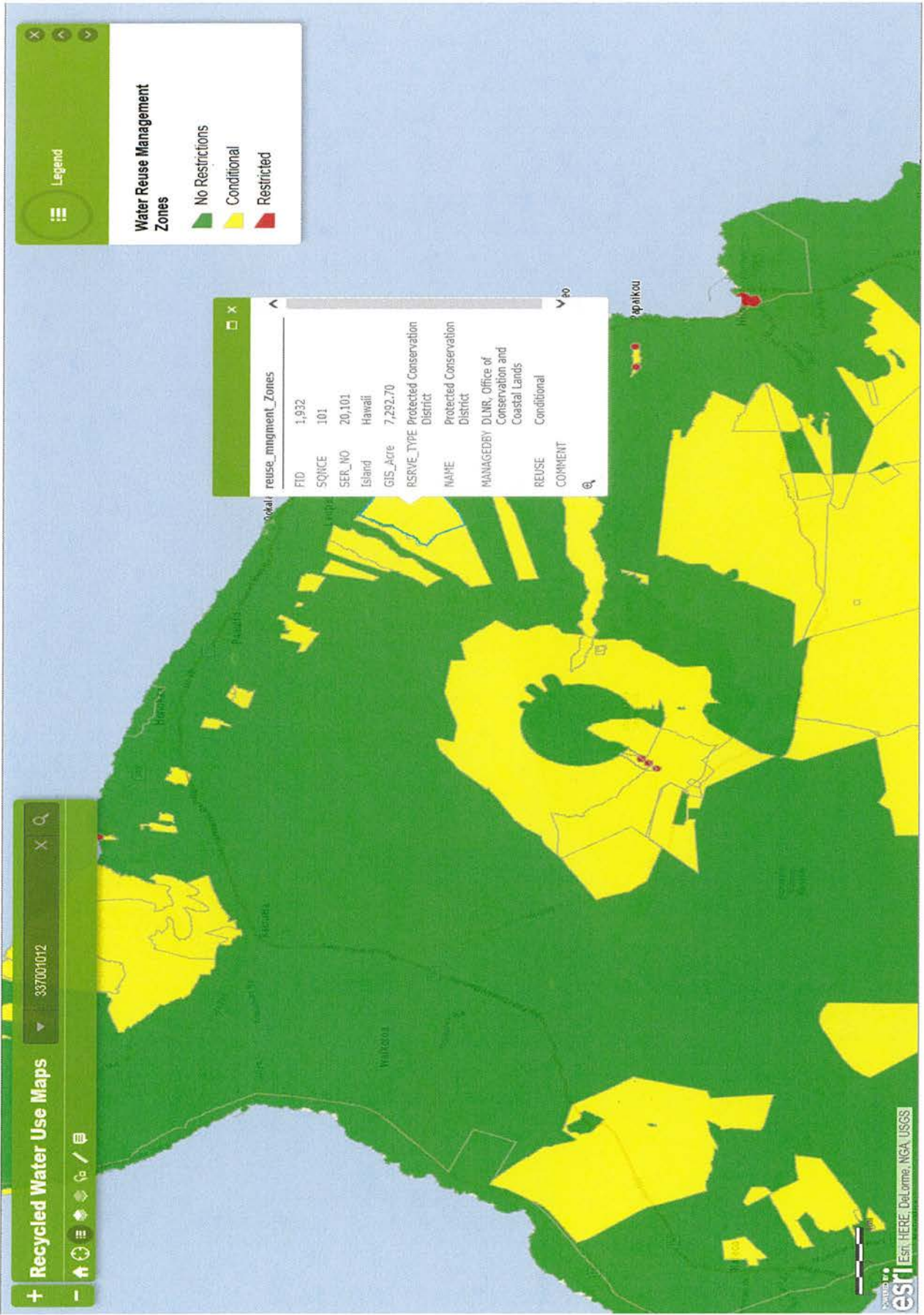
HAWAII COUNTY



0 10 20 40 MILES

ENVIRONMENTAL HEALTH MANAGEMENT ON HAWAII

MAP INTENDED FOR ILLUSTRATIVE PURPOSES ONLY. SITE LOCATIONS ARE APPROXIMATE.



HISTORIC SUGARCANE LANDS MAP VIEWER

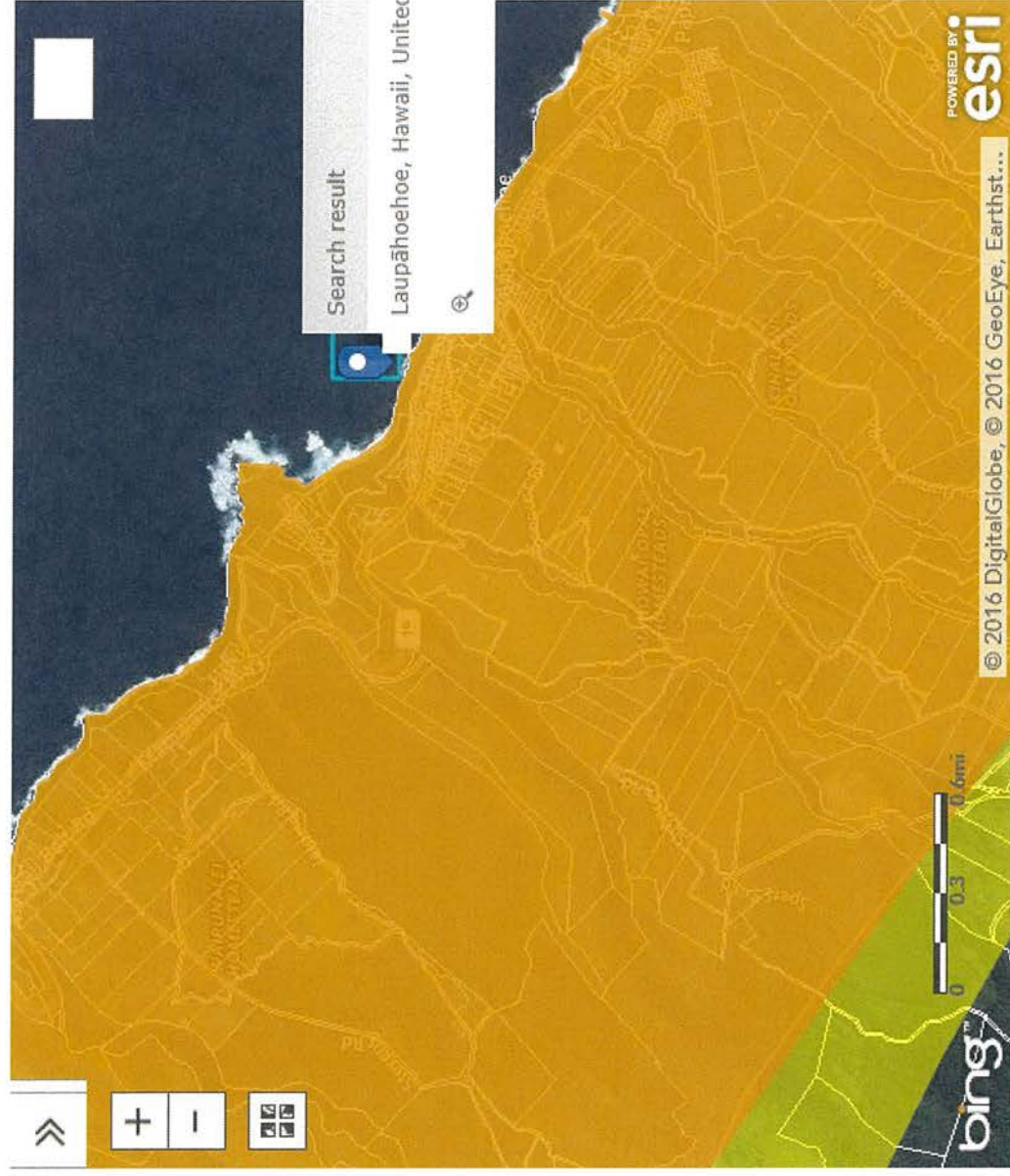
Legend

Details

Sugarcane - Sugarcane_1937

Sugarcane - Sugarcane_1920

Sugarcane - Sugarcane_1900



Hybrid



laupahoehoe

3 sites found

Results

Filter

Show sites with no location

Laupahoehoe Forest Research Educ
Center (IDEA-AFNSI)
Environmental Assessment (Agency)

Hawaii Experimental **Laupahoehoe**
Construction (FEA-FONS)
Environmental Assessment (Agency)

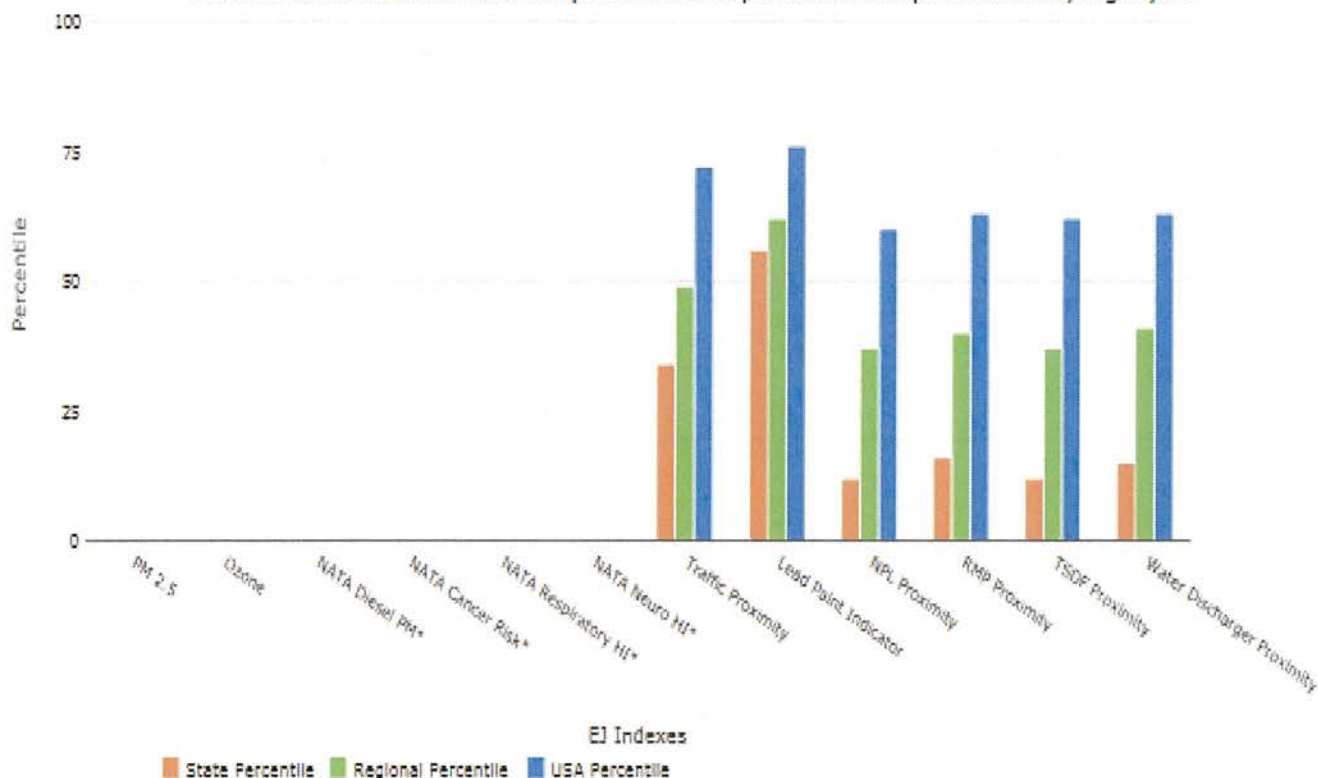
Hawaii Experimental Tropical Forest
Laupahoehoe Construction (IDEA-AFNSI)
Environmental Assessment (Agency)

1 mile Ring Centered at 19.972062,-155.239532
HAWAII, EPA Region 9
Approximate Population: 791



Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	N/A	N/A	N/A
EJ Index for Ozone	N/A	N/A	N/A
EJ Index for NATA Diesel PM*	N/A	N/A	N/A
EJ Index for NATA Air Toxics Cancer Risk*	N/A	N/A	N/A
EJ Index for NATA Respiratory Hazard Index*	N/A	N/A	N/A
EJ Index for NATA Neurological Hazard Index*	N/A	N/A	N/A
EJ Index for Traffic Proximity and Volume	34	49	72
EJ Index for Lead Paint Indicator	56	62	78
EJ Index for NPL Proximity	12	37	60
EJ Index for RMP Proximity	16	40	63
EJ Index for TSD Proximity	12	37	62
EJ Index for Water Discharger Proximity	15	41	63

EJ Index for the Selected Area Compared to All People's Block Groups in the State/Region/US

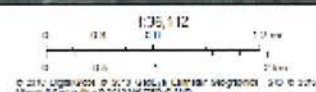


This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 99th percentile nationwide, this means that only 1 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.



March 11, 2015

✚ Digitized Point



Selected Variables	Raw data	State Average	%ile in State	EPA Region Average	%ile in EPA Region	USA Average	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	N/A	N/A	N/A	9.95	N/A	9.78	N/A
Ozone (ppb)	N/A	N/A	N/A	49.7	N/A	46.1	N/A
NATA Diesel PM ($\mu\text{g}/\text{m}^3$)*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Air Toxics Cancer Risk (risk per MM)*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Respiratory Hazard Index*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA Neurological Hazard Index*	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	44	280	37	190	36	110	55
Lead Paint Indicator (% pre-1980s housing)	0.24	0.17	69	0.25	59	0.3	53
NPL Proximity (site count/km distance)	0.0029	0.092	7	0.11	0	0.096	0
RMP Proximity (facility count/km distance)	0.033	0.18	8	0.41	4	0.31	6
TSDF Proximity (facility count/km distance)	0.003	0.092	7	0.12	0	0.054	3
Water Discharger Proximity (count/km)	0.029	0.33	7	0.19	5	0.25	4
Demographic Indicators							
Demographic Index	48%	51%	41	46%	55	35%	73
Minority Population	80%	77%	45	57%	71	36%	85
Low Income Population	17%	25%	35	35%	25	34%	25
Linguistically Isolated Population	1%	6%	28	9%	22	5%	49
Population with Less Than High School Education	7%	10%	44	18%	30	14%	33
Population under Age 5	9%	6%	76	7%	69	7%	73
Population over Age 64	12%	14%	42	12%	62	13%	51

*The National-Scale Air Toxics Assessment (NATA) environmental indicators and EJ indexes, which include cancer risk, respiratory hazard, neurodevelopment hazard, and diesel particulate matter will be added into EJSCREEN during the first full public update after the soon-to-be-released 2011 dataset is made available. The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

SUZANNE D. CASE
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COMMISSION ON WATER RESOURCE MANAGEMENT

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FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

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CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT

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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

Ms. Laura Leialoha Phillips McIntyre, AICP
Program Manager, Environmental Planning Office
Department of Health
PO Box 3378
Honolulu, HI 96801-3378

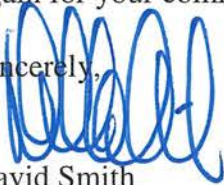
Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan
EPO 16-084

Dear Ms. McIntyre:

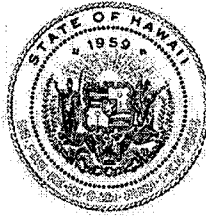
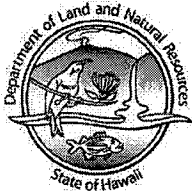
Thank you for the letter dated March 11, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate your review and your recommendations to 1) review the Environmental Planning Office's standard comments and available strategies to support sustainable and healthy design, 2) review the requirements for the National Pollutant Discharge Elimination System (NPDES) permit, 3) contact the Hazard Evaluation and Emergency Response Office's Site Discovery and Response Section and related historic maps on lands where sugarcane was grown; 4) examine the Hawaii Environmental Health Portal and the draft OEQC viewer (illustrating where previous HEPA documents have been prepared), and 5) explore the new environmental justice mapping and screening tool developed by the US Environmental Protection Agency. We have reviewed the additional resources and will integrate them as appropriate in further project planning to increase sustainable, innovative, inspirational, transparent and healthy design.

The Final Environmental Assessment will be available for your review when published. Thank you again for your comments and for your participation in the environmental review process.

Sincerely,


David Smith
Administrator, Division of Forestry and Wildlife

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813

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FORESTRY AND WILDLIFE
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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

Date: April 1, 2016
DAR # 5249

MEMORANDUM

TO: Bruce S. Anderson, DAR Administrator *BSA*
DATE:
FROM: Troy Sakihara, Aquatic Biologist *TS*
SUBJECT: Environmental Assessment for the Laupāhoehoe Forest Draft Management Plan *TS*

Comment	Date Request	Receipt	Referral	Due Date
	March 8, 2016	March 15, 2016	April 1, 2016	April 8, 2016

Requested by: Tanya Rubenstein, Natural Area Reserves Project Coordinator
Hawai'i Division of Forestry and Wildlife, Department of Land and Natural Resources

Summary of Proposed Project

Title: Draft Environmental Assessment for the Laupāhoehoe Forest Draft Management Plan,
(Hawai'i)

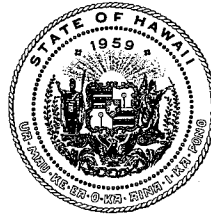
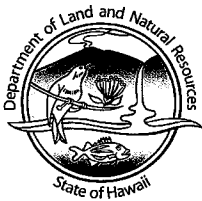
Project by: DOFAW, DLNR and USDA Forest Service Pacific Southwest Research Station's
Institute of Pacific Islands Forestry.

Location: State of Hawai'i, County of Hawai'i

Brief Description: This is a draft environmental assessment for a 15-year prospective draft management plan for the Laupāhoehoe Forest. The objective is to advance the preservation and protection of the Laupāhoehoe Forest's natural and archaeological resources, native biota and ecological integrity, as well as to enhance public use, education, recreation, outreach and research in this area. It was co-developed by DOFAW, USFS and the Laupāhoehoe Advisory Council.

Comments: Currently, DAR has no comments on the Draft Environmental Assessment for the Laupāhoehoe Forest Draft Management Plan. All potential concerns have been addressed. Thank you for providing DAR the opportunity to review and comment on the Draft Environmental Assessment. If any changes are made to the draft assessment, DAR requests the opportunity to review and comment on those changes.

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

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DEPUTY DIRECTOR - WATER

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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
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June 9, 2016

MEMORANDUM

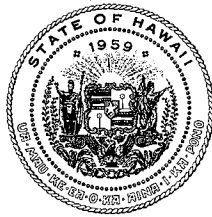
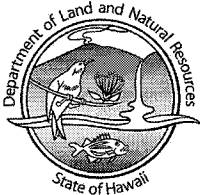
TO: Bruce S. Anderson, Administrator
Division of Aquatic Resources

FROM: David Smith, Administrator *DS*
Division of Forestry and Wildlife

Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan
DAR #5249

Thank you for the memorandum dated April 1, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate your review and acknowledge that DAR has no comment at this time.

The Final Environmental Assessment will be available for your review when published. Thank you again for your participation in the environmental review process.



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

OFFICE OF CONSERVATION AND COASTAL LANDS
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

REF:OCCL:TM

Correspondence: HA 16-162

MEMORANDUM

TO: Tanya Rubenstein, Project Coordinator
Natural Area Reserves, Division of Forestry & Wildlife

FROM: Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands

SUBJECT: Laupāhoehoe Forest Management Plan Located at North Hilo, Hawai'i, TMKs:
(3) 3-7-001: 002 & 012

APR - 5 2016

The Office of Conservation and Coastal Lands has reviewed the joint draft Environmental Assessment for the subject matter. According to the information provided, the Management Plan is proposed to be implemented over the next 15-years to support long-term protection of the native forest and watershed. The draft plan calls for the creation of new fenced conservation units of approximately 2,659-acres, the maintenance and development of identified primitive trails, the establishment of primitive camping at Shack Camp; increased opportunities for education and outreach visits and the installation of management shelters and helicopter landing zones.

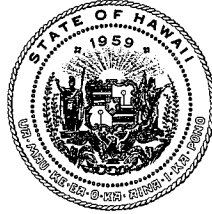
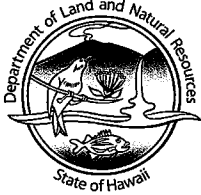
According to the information provided the project area was established in 1905 as a Forest Reserve. On May 8, 1981, Conservation District Use Permit SH-1340 authorized the subdivision of the Forest Reserve to establish the Natural Area Reserve upon parcel 012. The OCCL notes parcel 002 lies within the Resource subzone and parcel 012 lies within the Protective subzone.

The OCCL believes the proposed management activities may be considered an existing land use within the Natural Area Reserve and Forest Reserve pursuant to the Hawai'i Administrative Rules (HAR), §13-5-22 P-8 STRUCTURES AND LAND USE, EXISTING (B-1) Demolition, removal, or minor alteration of existing structures, facilities, land, and equipment. Any historical property shall be evaluated by the department for historical significance.

The installation of management shelters and helicopter landing zones may be considered accessory to the existing land use pursuant to the Hawai'i Administrative Rules (HAR), §13-5-22 P-9 STRUCTURES, ACCESSORY (B-1) construction or placement of structures accessory to existing facilities or uses.

These proposed land uses require filing for a Site Plan Approval (SPA). Upon completion of the final EA, please apply for a SPA. Should you have any questions regarding this memorandum, contact Tiger Mills of our Office at (808) 587-0382.

DAVID Y. IGE
GOVERNOR OF HAWAII



**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES**

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

MEMORANDUM

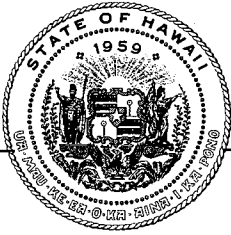
TO: Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands

FROM: David Smith, Administrator *DS*
Division of Forestry and Wildlife

Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan
HA 16-162

Thank you for the memorandum dated April 5, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate your review and acknowledge your comment that proposed land uses identified in the Management Plan require filing for a Site Plan Approval (SPA). We will continue to coordinate with your office to ensure that all Conservation District requirements are met prior to the implementation of any new land uses.

The Final Environmental Assessment will be available for your review when published. Thank you again for your comments and for your participation in the environmental review process.



OFFICE OF ENVIRONMENTAL QUALITY CONTROL

DEPARTMENT OF HEALTH, STATE OF HAWAII
235 South Beretania Street, Suite 702, Honolulu, HI 96813

DAVID Y. IGE
GOVERNOR

SCOTT GLENN
DIRECTOR

Phone: (808) 586-4185
Email: oeqchawaii@doh.hawaii.gov

April 7, 2016

Tanya Rubenstein, Natural Area Reserves Project Coordinator
Division of Forestry and Wildlife
Department of Land and Natural Resources
1151 Punchbowl Street, Rm. 325
Honolulu, HI 96813

Dear Ms. Rubenstein,

SUBJECT: Draft Environmental Assessment (EA) for Laupāhoehoe Forest Draft Management Plan,
North Hilo District, Island of Hawai'i

The Office of Environmental Quality Control (OEQC) reviewed the Draft EA prepared for the subject project and offers the following comments for your consideration.

The OEQC commends the project for its native ecosystem conservation efforts. Since this plan covers the next 15 years of management for Laupāhoehoe Forest, OEQC recommends including the reforestation plans. As acknowledged in the Draft EA, forest growth, composition and structure may be altered in response to climate change. In an adaptive management framework, this could lead to new conservation strategies in which more fencing or other strategies are needed. The current Management Plan does not discuss additional fencing within Laupāhoehoe or any future reforestation actions. Since the methods of planting can have additional environmental impacts not originally captured in the Draft EA, please include a description of reforestation activities and any mitigation measures as appropriate (HAR §11-200-10(7)). Additionally, OEQC recommends a discussion of the reforestation aspect of this project within the context of secondary impacts, as per HAR §11-200-10(6).

Thank you for the opportunity to comment on the Draft EA. We look forward to a response that also will be included within the project's Final EA. If you have questions about these comments, please consult myself or Tom Eisen in our office at (808) 586-4185.

Sincerely,

Scott Glenn, Director

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
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HISTORIC PRESERVATION
KAIHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

Mr. Scott Glenn
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, HI 96813

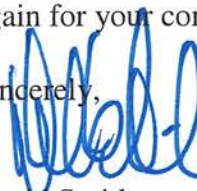
Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan

Dear Mr. Glenn:

Thank you for the letter dated April 7, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate your review and comments to incorporate reforestation plans and information about fencing. In finalizing the Management Plan, additional information has been added regarding forest health and anticipated methods of reforestation over the next 15 years (natural regeneration, replanting by hand and small mechanical equipment in existing forest, koa scarification but only in former pasture lands). Modifications have been made in the Final Environmental Assessment (EA) where necessary to reflect this additional information or to incorporate information from the 2006 Hilo Forest Reserve Reforestation Project Final EA (http://oeqc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Hawaii/2000s/2006-10-08-HA-FEA-HILO-FOREST-RESERVE-REFORESTATION.pdf). The Management Plan discusses and recommends protection of approximately 2,694 acres through fencing.

The Final Environmental Assessment will be available for your review when published. Thank you again for your comments and for your participation in the environmental review process.

Sincerely,


David Smith
Administrator, Division of Forestry and Wildlife

William P. Kenoi
Mayor



Harry S. Kubojiri
Police Chief

Paul K. Ferreira
Deputy Police Chief

County of Hawai`i

POLICE DEPARTMENT

349 Kapi`olani Street • Hilo, Hawai`i 96720-3998
(808) 935-3311 • Fax (808) 961-2389

March 14, 2016

Ms. Tanya Rubenstein
Natural Area Reserves Project Coordinator
State of Hawaii, Department of Land and Natural Resources
Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, HI 96813

Dear Ms. Rubenstein:

Subject: Draft Environmental Assessment (DEA) for the Laupāhoehoe Forest Management Plan (HI)

Staff, upon reviewing the Draft Environmental Assessment, does not have any comments or public safety concerns.

If you have any questions, please contact Captain Andrew Burian, Hāmākua District Commander, at 808-775-7533 or via email at andrew.burian@hawaiiicounty.gov.

Sincerely,



HENRY J. TAVARES JR.
ASSISTANT POLICE CHIEF
AREA I OPERATIONS BUREAU

AB:lli
150683

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
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SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
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JEFFREY T. PEARSON, P.E.
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CONSERVATION AND RESOURCES ENFORCEMENT
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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

Mr. Henry Tavares, Jr.
Assistant Police Chief
County of Hawaii Police Department
349 Kapiolani Street
Hilo, HI 96720

Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan

Dear Mr. Tavares:

Thank you for the letter dated March 14, 2016 on the DEA for the Laupāhoehoe Forest Management Plan stating that the Police Department has no comments or public safety concerns. Thank you for your review and for your participation in the environmental review process. The Final Environmental Assessment will be available on-line when published.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Smith", is written over the word "Sincerely,".

David Smith
Administrator, Division of Forestry and Wildlife

William P. Kenoi
Mayor



Duane Kanuha
Director

Joaquin Gamiao-Kunkel
Deputy Director

West Hawai'i Office
74-5044 Ane Keohokalole Hwy
Kailua-Kona, Hawai'i 96740
Phone (808) 323-4770
Fax (808) 327-3563

County of Hawai'i

PLANNING DEPARTMENT

East Hawai'i Office
101 Pauahi Street, Suite 3
Hilo, Hawai'i 96720
Phone (808) 961-8288
Fax (808) 961-8742

April 7, 2016

Ms. Tanya Rubenstein
Natural Area Reserves Project Coordinator
DLNR, Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, HI 96813

Dear Ms. Rubenstein:

SUBJECT: Draft Environmental Assessment
Applicant: Department of Land and Natural Resources, Division of Forestry & Wildlife and U.S. Department of Agriculture Forest Service
Project: Laupāhoehoe Forest Draft Management Plan
TMK: (3) 3-7-001:002 & 012, North Hilo, Hawai'i

This is to acknowledge receipt of your March 8, 2016, letter requesting comments from this office regarding the Draft Environmental Assessment (DEA) for the subject project.

The Management Plan proposes actions to be implemented over the next 15 years to support long-term protection of the native forest and watershed. In addition to continuing existing management, proposed is the fencing of conservation units, maintenance and development of identified primitive trails within the forest and establishment of primitive camping at Shack Camp; increased opportunities for education and outreach visits; and installation of management shelters and helicopter landing zone to support natural resources management, wildfire suppression and emergency response.

According to the Real Property Tax Office, Parcel 2 consists of 4,448.95 acres and Parcel 12 consists of 7,894 acres. Both are designated Forest Reserve by the County and designated Conservation by the State Land Use Commission. As it is designated Conservation by the State Land Use Commission, however, Hawai'i Revised Statutes Chapter 205-5(a) states that the Department of Land and Natural Resources has jurisdiction over uses and activities on State designated Conservation land.

The Hawai'i County General Plan Land Use Allocation Guide (LUPAG) Map designates both parcels as Conservation, with land use for *"Forest and water reserves, natural and scientific preserves, areas in active management for conservation purposes, areas to be kept in a largely natural state, with minimal facilities consistent with open space uses, such as picnic pavilions*

Ms. Tanya Rubenstein
April 7, 2016
Page 2

and comfort stations, and lands within the State Land Use Conservation District.” Further, it is not located within the Special Management Area.

The Draft Hāmākua Community Development Plan is currently undergoing public review; however, its previously adopted Community Objective 1 states the following:

“Protect, restore, and enhance watershed ecosystems, sweeping views, and open spaces from mauka forests to makai shorelines, while assuring responsible public access for recreational, spiritual, cultural, and sustenance practices.”

In support of this objective, comments from the enclosed Cultural Resources Commission letter dated January 22, 2016, regarding public access, trails, and historic sites within the subject properties are particularly significant. Ensuring that these resources are clearly identified and preserved and that future opportunities for development of appropriate access are pursued should remain project priorities.

Thank you for the opportunity to provide comments on the proposed project.

If you have questions, please contact Esther Imamura of our office at (808) 961-8139.

Sincerely,



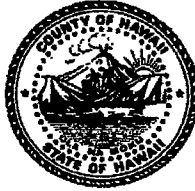
for DUANE KANUHA
Planning Director

ETI:ja

\\Coh33\planning\public\wpwin60\ETI\EA\draftPre-consul\Rubenstein Laupahoehoe Forest Draft Mgmt Plan.doc

Enc.: Cultural Resources Commission Letter dated January 22, 2016

William P. Kenoi
Mayor



Deborah Chang, Chair
Ke'ala Lee Loy, Vice Chair
Ronald Dela Cruz
Lily Dudoit
Nicole Lui
Barbara Meheula
Boone Morrison
Christine Wada

County of Hawai'i

PLANNING DEPARTMENT CULTURAL RESOURCES COMMISSION

Aupuni Center • 101 Pauahi Street, Suite 3 • Hilo, Hawai'i 96720
Phone (808) 961-8288 • Fax (808) 961-8742

January 22, 2016

Ms. Tanya Rubenstein
Natural Area Reserves Project Coordinator
Department of Land and Natural Resources, Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, HI 96813

Dear Ms. Rubenstein:

SUBJECT: Pre-Consultation on Environmental Assessment (EA) for the Draft Laupāhoehoe Forest Management Plan

TMKs: (3) 3-7-001:002 and 012, Laupāhoehoe, North Hilo, Hawai'i

The Hawai'i County Cultural Resources Commission (CRC) reviewed the subject Draft Management Plan for Laupāhoehoe Forest at their January 13, 2016 meeting, and thanks you for the opportunity to comment. The CRC was appreciative of the attendance of Mr. Nicholas Agorastos and Ms. Tabettha Block, who represented the Draft Management Plan and was able to answer questions from the commissioners.

The CRC understands that the Draft Management Plan is to be a guiding document for the management of the 12,342 acre Laupāhoehoe Forest over the next fifteen years. Proposed management actions include fence construction, pig removal, weed control, outplanting of native plants, wildfire prevention and response, public access and the development of trails, continued research, and encouragement of education and outreach programs. While Mr. Agorastos and Ms. Block answered many of the questions that the commissioners had regarding the Draft Management Plan and the preparation of the draft EA, we are listing the comments below as record of the consultation.

Comments were as follows:

- P. 15: It is mentioned that gathering for Native Hawaiian religious and customary gathering rights requires an HETF permit. Please elaborate on the procedure for applying for a permit, considerations made when granting an HETF permit (i.e. non-commercial,

- limits on quantity and species, number of individuals applying), the permitting authority (including length of time it takes to review and issue a permit), permit enforcement, and how the permit is in alignment with the protection of Hawaiian rights as identified under judicial decisions.
- P. 17: No mention is made of the Waipunalei Trail. Maly & Maly call it the Waipunalei-Laupāhoehoe trail. Please include it in the list and maps of trails within the Laupāhoehoe Forest and be on alert for traditional features made of stone that would be remnants of the historic trail. According to the Maly study, there is an 1856 reference to road work done on this trail, which may make it subject to the Highways Act of 1892, as currently administered by DLNR - Nā Ala Hele.
 - P. 17: The draft EA should identify the location of historic trails on the property to avoid blocking passage on them when building fence lines.
 - P. 20: The Shack Camp is already being used as a staging area for activities in the upper forest and is planned as a "primitive camping area" for the public in the future. Has any historic resources or archaeological inventory or preservation plan been done to identify what remains of this historic site and area to ensure that its historic record is preserved? This should be done before further human impacts occur and advice from State Historic Preservation Division (SHPD) and the CRC sought regarding management of the historic and cultural resources.
 - P. 36: Shack Camp should be included in the listing of archaeological and historic sites.
 - P. 64: Under "Cultural Resources" it should be clear to permittees, researchers, staff, and the public that any inadvertently discovered cultural resources, including prehistoric artifacts, stone platforms, cairns, caves etc. (not just burials) should be reported immediately. This should be included as a condition in all permits.
 - Pp. 79-82: There are no planned actions for archaeological survey and/or historic preservation of Shack Camp or the Maulua and Waipunalei trails. This should be part of the plan. We note that the need is generally acknowledged on p. 55 as a proposed action under "Research" with no specific time frame. Such surveys should be done early before ground disturbance inadvertently damages the sites.
 - The County of Hawai'i recently acquired public access from Uweki Road (Maulua) along the northern property boundary of TMK: (3) 3-4-002:004 mauka to the Laupāhoehoe Forest Reserve as part of a subdivision action on the stated parcel. This access should be included in the public access locales described in the management document. A copy of the access agreement can be provided upon request.
 - The County of Hawai'i General Plan is the policy document for the long range comprehensive development of the island of Hawai'i. In part, the purpose of the General Plan is to provide a framework for regulatory decisions, capital improvement priorities, acquisition strategies, and other pertinent government programs within the County organization and coordinated with State and Federal programs. The draft EA should evaluate the project with respect to the General Plan. Other than the goals/policies already identified in the draft management plan on Table 1 (p. 13), please also consider

Ms. Tanya Rubenstein
DLNR, Division of Forestry and Wildlife
Page 3
January 22, 2016

County of Hawai'i General Plan goals and policies relating to historic sites, specifically policies 6.3(e) and 6.3(k).

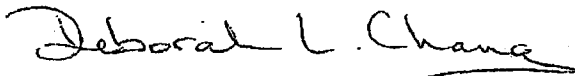
- There appear to be several historic sites on the property including the Dr. David Douglas monument, remnants of the Kūka'iau Ranch, and at least a few historic trails. An evaluation of the properties' significance for inclusion on the State (HAR 13-198) or National Register of Historic Places (36 CFR Part 60) should also be made.
- The proposed management plan (beginning on p. 45) should include any plans for the treatment and management of the known historic properties. As there is a good probability that there are extant historic and cultural properties on the subject lands that have yet to be identified, the management plan should also include a process by which these resources can be identified, communicated to forestry management, and incorporated into the plan such that the resources can be managed properly.

In response to your request for contact information for individuals or organizations that may be willing to share their cultural knowledge of the area, the following have been identified:

- Hui Mālama i ke Ala 'Ūlili; <http://www.alaulili.com/> or kealaulili@gmail.com
- Leon No'eau Peralto; leon.peralto@gmail.com
- Jeffrey Dias; phone (808) 776-1273
- Waltham Johansen; P.O. Box 72, Pa'auilo, HI 96776

Mahalo for allowing us the opportunity to provide pre-consultation comments for the preparation of a draft EA for the Laupāhoehoe Forest Management Plan, we look forward to review of the draft. Should you have any questions regarding the consultation, please contact CRC staff member Lucas Mead at (808) 961-8140 or at Lucas.Mead@hawaiicounty.gov.

Me ka pono,



DEBORAH CHANG, Chairperson
Hawai'i County Cultural Resources Commission

LM:klt

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EA - CRC to.DOF.AW.doc

cc via email: Hawai'i County Cultural Resources Commission
Nicholas Agorastos nicholas.v.agorastos@hawaii.gov
Tabetha Block tabethaablock@fs.fed.us

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
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JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
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HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

Mr. Duane Kanuha
Planning Director
County of Hawaii Planning Department
101 Pauahi Street, Suite 3
Hilo, HI 96720

Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan

Dear Mr. Kanuha:

Thank you for the letter dated April 7, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate your review and comments confirming land use designations for the project area. In addition, thank you for forwarding the January 22, 2016 comments from the County's Cultural Resources Commission. We incorporated their input into development of the DEA and attended their April 13, 2016 meeting to continue the dialogue and receive comments on the DEA itself. Ensuring that public access, trails, and historic sites within Laupāhoehoe Forest are identified and preserved and that future opportunities for development of appropriate access are pursued remain priorities for management over the next 15 years.

The Final Environmental Assessment will be available for your review when published. Thank you again for your comments and for your participation in the environmental review process.

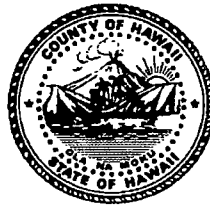
Sincerely,



David Smith

Administrator, Division of Forestry and Wildlife

William P. Kenoi
Mayor



County of Hawai'i

PLANNING DEPARTMENT CULTURAL RESOURCES COMMISSION

Aupuni Center • 101 Pauahi Street, Suite 3 • Hilo, Hawai'i 96720
Phone (808) 961-8288 • Fax (808) 961-8742

Deborah Chang, Chair
Ke'ala Lee Loy, Vice Chair
Ronald Dela Cruz
Theresa Donham
Lily Dudoit
Nicole Lui
Barbara Meheula
Boone Morrison
Christine Wada

April 21, 2016

Ms. Tanya Rubenstein
Natural Area Reserves Project Coordinator
Department of Land and Natural Resources, Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, HI 96813

Dear Ms. Rubenstein:

SUBJECT: Review of Draft Environmental Assessment (dEA) for the Draft Laupāhoehoe Forest Management Plan

TMKs: (3) 3-7-001:002 and 012, Laupāhoehoe, North Hilo, Hawai'i

The Hawai'i County Cultural Resources Commission (CRC) reviewed the subject Draft Environmental Assessment (dEA) prepared for the Draft Laupāhoehoe Forest Management Plan at their April 13, 2016, meeting and thanks you for the opportunity to comment. The CRC was appreciative of the attendance of Ms. Melissa Dean, who represented the dEA and was able to answer questions from the commissioners. The CRC previously discussed and commented on the Draft Laupāhoehoe Forest Management Plan at their January 13, 2016, meeting.

The CRC thanks the preparers of the dEA for incorporating much of the feedback offered at the previous consultation. Specifically, the requirements for securing an HETF permit were made clear, and the incorporation of fence pass-overs to allow for continued functional use of the trails is much appreciated. The CRC did note a few areas in the dEA that could benefit from more clarity, specifically:

- P. 12 under the heading "Legal and Policy Guidance," please consider adding HAR 13-275 "Rules Governing Procedures for Historic Preservation Review for Governmental Projects Covered Under Sections 6E-7 and 6E-8." Additionally, consider more specificity with regards to "HRS Chapter 6E" to include HRS Chapter 6E-8 and what is required of the agency under that statute.
- P. 21: Please include Uweki Rd. access on Figure 2.

Ms. Tanya Rubenstein
DLNR, Division of Forestry and Wildlife
Page 2
April 21, 2016

- P. 27: Figure 3 shows a proposed exclosure unit that intersects with the Waipunalei Trail/Road. Please educate staff working in this area to be aware of the trail/road and to look for signs of its alignment as it may exist on the ground.
- P. 69: Please correct “the Great Mahele of 1948” to read “the Great Mahele of 1848.”
- P. 71: Please revise the following sentence to delete the strike-through and add the underlined, “If any burial remains should be discovered, they ~~should~~ shall be treated on a case-by-case basis in concurrence with Chapter 6E-43 (as amended by Act 306).” Notification of findings to the State Historic Preservation Division is required and is not at the discretion of the Department of Land and Natural Resources (DLNR).
- P. 73: The CRC administers the Certified Local Government (CLG) program of federal assistance for historic preservation within the county, and as such, is a Section 106 consulting party. The CRC would appreciate the opportunity to participate in future consultations with the USDA Forest Service and DLNR-Division of Forestry and Wildlife on proposed actions or undertakings that may involve historic resources within the Laupāhoehoe Forest.

Mahalo for allowing us the opportunity to provide comments on the draft EA for the Laupāhoehoe Forest Management Plan. Should you have any questions regarding the consultation, please contact CRC staff member Lucas Mead at (808) 961-8140 or at Lucas.Mead@hawaiiicounty.gov.

Me ka pono,



DEBORAH CHANG, Chairperson
Hawai‘i County Cultural Resources Commission

LM:klt

\\coh33\planning\public\wpwin60\Cultural Resources Commission\Projects\Laupahoehoe Forest Management Plan\LFMP draft EA - CRC to DOFAW.doc

cc via email: Hawai‘i County Cultural Resources Commission
Ms. Melissa Dean, mkdean@hawaii.edu

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
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SUZANNE D. CASE
CHAIRPERSON
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KEKOA KALUHIWA
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JEFFREY T. PEARSON, P.E.
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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

Ms. Deborah Chang, Chairperson
Hawaii County Cultural Resources Commission
Aupuni Center
101 Pauahi Street, Suite 3
Hilo, HI 96720

Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan

Dear Ms. Chang:

Thank you for the letter dated April 21, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate the thorough review by the Cultural Resources Commission and intend to incorporate the specific recommendations into the Final EA.

The Final Environmental Assessment will be available for your review when published. Thank you again for your comments and for your participation in the environmental review process.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Smith".

David Smith
Administrator, Division of Forestry and Wildlife



**Conservation Council
for Hawai'i**

Hawai'i's voice for wildlife

Kō Hawai'i leo no nā holoholona lōhiu



April 8, 2016

Tanya Rubenstein
Department of Land and Natural Resources
Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, HI 96813

Via Email Transmittal: tanya.rubenstein@hawaii.gov

Comments on the Draft Environmental Assessment Laupahoehoe
Draft Forest Management Plan
March 2016

Dear Ms. Rubenstein,

Aloha. The Conservation Council for Hawai'i (CCH) submits the following comments on the Draft Environmental Assessment (EA) for the Draft Laupahoehoe Forest Management Plan March 2016. We support proposed alternative 2: implementation of the Laupahoehoe Forest Draft Management Plan for the next 15 years. The Laupahoehoe Forest includes the 7,894-acre Laupahoehoe Natural Area Reserve.

The Natural Area Reserves System (NARS) was established by Governor John Burns and the Hawai'i State Legislature in 1970 to "preserve in perpetuity specific land and water areas which support communities, as relatively unmodified as possible, of native flora and fauna, as well as geological sites, of Hawai'i."

CCH has a long history of supporting the NARS, including its creation in 1970. We served as one of the leading non-government organizations in securing dedicated funding for the NARS in 2005, which, unfortunately, was eliminated by the Hawai'i state legislature in 2015. We support all efforts to increase funding for the NARS and its geographic scope.

General Comments

We support DOFAW's proposal to implement important management actions in the Laupahoehoe Forest, which, at least the very least, may prevent or slow native species declines and extinctions. It is surprising that anything native still occurs in the Laupahoehoe Forest.

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P.O. Box 2923 | Honolulu, HI 96802 | Office: 250 Ward Ave., Suite 220 | Honolulu, HI 96814

President: Julie Leialoha | Vice President: Koalani Kaulukukui | Secretary: Wayne Tanaka
Treasurer: Ryan Belcher | Directors: Rick Barboza | Anne Huggins Walton
Executive Director: Marjorie Ziegler | Administrator: Jonnetta Peters



However, we are concerned that in the past 55 years since the NARS was established, only a small percentage of the reserves have been fenced and managed. Protecting introduced feral and game mammals continues to take precedence over the protection of native species and ecosystems in many areas managed by the State. Allowing feral and game mammals to roam over hundreds of thousands of acres of public land – including native forests, essential watersheds, and habitats for rare and endangered species – ultimately costs the people of Hawai‘i in reduced watershed services and water resources, diminished water quality in streams and nearshore waters, and the loss of unique Hawaiian plants and animals, which is often irreversible.

Furthermore, we are concerned because some of the Division of Forestry and Wildlife (DOFAW) policies are contrary to the purpose and objectives of the NARS. For example, bag limits for feral and game mammals in the reserves on Kaua‘i and Hawai‘i islands were still on the books during the last round of administrative rule changes 4-5 years ago. We hope DOFAW has taken steps to align its administrative rules, programs, policies, and staff so that the NARS is, in fact, protected in perpetuity.

Specific Comments and Questions

1. Laupahoehoe Natural Area Reserve is a biological treasure, deserving the highest level of protection. It is also in dire need of active management. We support increased fencing in the reserve. Only 35 acres (less than half of 1%) have been fenced in the entire Laupahoehoe Natural Area Reserve over the past 33 years since the reserve was designated in 1983. In proposed alternative 2, DOFAW proposes to fence approximately 33% of the Laupahoehoe Natural Area Reserve (22% of the entire Laupahoehoe Forest).

In 15 years from now, even less of the Laupahoehoe Natural Area Reserve will be worthy of protection unless more areas are fenced and actively managed now. The Draft EA should describe what will happen to the Natural Area Reserve and the Forest Reserve if only 2,659 acres are fenced and managed in the next 15 years, including the number of acres of native forest and habitat that will be lost to invasive species, which native species will decline and by how much, and which native species will be lost in the area or go extinct in its entire range.

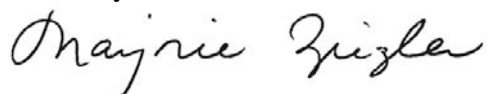
2. The Draft EA should include a discussion on the past, current, and proposed taking of endangered plants and animals by game mammals, and the status of any incidental take licenses by the State relating to listed plants and animals, and any incidental take permits by the U.S. Fish and Wildlife Service for listed animals resulting from DOFAW’s game “management” and public hunting programs.
3. The Draft EA should also describe what is likely to happen in areas set aside for game management and public hunting under the no-action alternative and under the proposed alternative 2. For example, are there any plans to contain game mammals in fenced areas, or to improve habitat for game mammals, or does DOFAW intend to let game mammals destroy their own habitat and additional native areas that could be fenced 15 years from now.
4. According to the Draft EA, 16 listed endangered plant taxa occur in the Laupahoehoe Forest, including six taxa for which critical habitat has been designated by the U.S. Fish and Wildlife Service. Is critical habitat for *Clermontia pyramidalis* and *Cyanea platyphylla* in the Laupahoehoe Forest? If so, why is no critical habitat for these two species included in the Draft EA?

5. The Draft EA should include more detail on the impacts of rodents and mongooses on native plants, animals, and ecosystems in the Laupahoehoe Forest.
6. The Draft EA should describe erosion caused by feral pigs in the Laupahoehoe forest, and its effects on water quality in streams and nearshore waters. Why were none of the streams in the Laupahoehoe Forest identified in the 2014 State of Hawai'i Water Quality Management & Assessment Report? Did the report fail to acknowledge Laupahoehoe streams at all, or are these streams in compliance with water quality standards? Does DOFAW propose any water quality monitoring stations or stream gages?
7. Is there a second species of native aquatic crustacean found in the Laupahoehoe Forest (in addition to *Atyoida bisulcata*), or is the second species non-native (see Draft EA page 45 and Draft Management Plan Table 6 on page 35)?
8. We understand that the Laupahoehoe Forest is ceded land. If so, the Draft EA should discuss the importance of this land-use status, the State's duty to protect public trust resources, and the State's obligations related to ceded land.
9. Alternative 2 is consistent with current plans and initiatives to protect essential watersheds, including the Rain Follows the Forest initiative. Is the Laupahoehoe Forest a high-priority watershed in this initiative?
10. Alternative 2 is consistent with federal and state laws to protect endangered species and threatened species; the federal government's duty to conserve listed species and the prohibition against destruction or adverse modification of critical habitat under the federal Endangered Species Act. Alternative 2 is also consistent with the State's efforts to mitigate the impacts of climate change on native species and ecosystems.
11. Is the Laupahoehoe Forest part of the any past or ongoing public-private partnerships? If so, the Draft EA should discuss the impacts of the no-action alternative on protecting the taxpayers' investment in species and habitat conservation in the region.
12. Who served on the Laupahoehoe Advisory Council, and what are their affiliations?

In summary, we support alternative 2, which will protect public trust resources on ceded land in the Laupahoehoe Natural Area Reserve. No significant adverse effects to the environment, culture, archeological features, or public access are anticipated. The proposed mitigation measures are appropriate and reasonable. We are confident the long-term benefits of alternative 2 will far outweigh any possible short-term impacts.

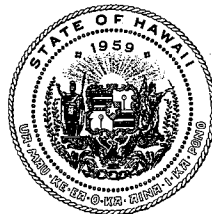
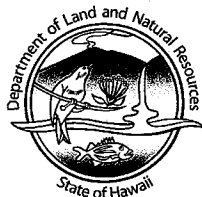
Mahalo nui loa for the opportunity to comment.

Sincerely,



Marjorie Ziegler

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
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CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

Ms. Marjorie Ziegler
Conservation Council for Hawaii (CCH)
PO Box 2923
Honolulu, HI 96802
mz@conservehi.org

Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan

Dear Ms. Ziegler:

Thank you for the letter dated April 8, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate your review and your general support for the Draft Management Plan, as well as the support CCH has provided for the Natural Area Reserves System (NARS) and for conservation in Hawaii over the past several decades. We recognize your specific comments and address them as follows:

- 1) We appreciate your support for increased fencing within Laupāhoehoe Forest and recognize your desire to protect an even larger area of the Forest from ungulates. The Management Plan identifies proposed management actions that we believe can realistically be implemented over the next 15 years, based on our best estimates of funding and resources available over that time period. Currently, approximately 35 acres within the Laupāhoehoe Forest is fenced and the Management Plan proposes to greatly expand the protected area to approximately 2,659 acres, prioritizing areas of intact high quality native forest. If we are able to fully implement the Management Plan over the next 15 years, future Management Plans (2031 and beyond) may identify opportunities to expand the conservation units. It is not possible to predict the number of acres of forest that may be lost to invasive species, the extent of native species' decline, or the number of extinctions that may occur over the next fifteen years outside of the fenced conservation units, as native forest and habitat is subject to innumerable threats unrelated to ungulates (e.g., forest fire, drought, introduced disease).
- 2) We acknowledge your request that the DEA include a discussion on the past, current, and proposed taking of endangered plants and animals by game mammals and the status of any incidental take licenses by the State or USFWS for listed animals resulting from DOFAW's game management and public hunting programs. At this time, there are no incidental take

licenses for Laupāhoehoe Forest issued by either the State or USFWS relating to game management or hunting.

- 3) The Laupāhoehoe Forest Management Plan does not set aside any areas for game management; management to increase game mammal populations for hunting conflicts with DOFAW management priorities for Laupāhoehoe Forest, as well as with federally designed critical habitat for endangered species. Outside fenced conservation areas, Laupāhoehoe Forest will continue to be managed for multiple uses, including research, rare plant protection, wildfire response, reforestation, educational outreach, recreation, and hunting. Habitat will not be improved for the benefit of game mammals. This plan seeks to increase public hunting opportunities in more accessible areas outside the fenced conservation units through improvements in public access.
- 4) Critical habitat for *Clermontia pyrrularia* and *Cyanea platyphylla* was designated in 2003 and does overlap with Laupāhoehoe Forest. Language in the EA has been clarified to reflect this.
- 5) Additional information will be provided in the Final EA regarding the negative impacts of rodents and mongoose on native plants, animals and ecosystems and will reference the Programmatic Environmental Impact Statement currently in development to analyze the impacts of, and alternatives to, integrated pest management to control or eradicate invasive rodents and mongoose.
- 6) The DEA does note that negative impacts to water resources associated with ungulate activity (e.g., rooting and wallowing behavior contributing to soil disturbance and erosion and contributing to stream water turbidity) would be anticipated to continue, leading to a long slow decline of watershed function. None of the streams in Laupāhoehoe Forest are identified in the 2014 State of Hawai'i Water Quality Monitoring and Assessment Report; the streams were not identified at all in the list of assessed streams on Hawaii island. Stream gauges, used to measure natural stream flows, water quality, and sediment in a non-destructive manner are located in Manowai'ōpai, Kaiwilahilahi, and Ka'awali'i streams below Laupāhoehoe Forest and monitored by the U.S. Forest Service.
- 7) The second species of crustacean found within some streams in Laupāhoehoe Forest is *Macrobrachium lar*, a non-native species of freshwater shrimp.
- 8) Language in the EA has been added to reflect that Laupāhoehoe Forest is ceded land and to acknowledge the State's obligations under Article 11 of the Hawai'i State Constitution and 5(f) of the Admission Act.
- 9) Laupāhoehoe Forest is identified as a priority watershed area on the island of Hawai'i by the Rain Follows the Forest initiative.

10) Laupāhoehoe Forest is within the Mauna Kea Watershed Alliance; this public-private partnership includes approximately 484,000 acres on the mountain of Mauna Kea. The Alliance seeks to manage critical watersheds on a landscape-level by initiating planning for priority areas with the goal of implementing management actions for threats such as feral ungulates, fire, and invasive non-native plants. The Draft EA currently notes that the no-action alternative would likely contribute to a long slow decline of native forest and habitat as a result of continued ungulate activity, weeds, and predators, negatively impacting the community recognized assets of Laupāhoehoe Forest.

11) Members of the Laupāhoehoe Advisory Council, and their affiliations, are as follows:

First Name	Last Name	Start	End	Area of Expertise
Thomas	Fratinarido	Dec-10	Mar-13	Laupahoe Community at Large
Evelyn	Burnett	Dec-10	Apr-14	Education
Jayne	Carvalho	Dec-10	Apr-14	Recreation
Walker	Sanders	Dec-10	May-14	Education
Peter	Mills	Dec-10	Sep-14	Cultural Resources
Paul	Souza Dias	Dec-10	Aug-15	Recreation
Derwin	Ignacio	Dec-10	Sep-15	Laupahoe Community at Large
Bill	Stormont	Dec-10	Mar-16	Natural Resource Management
David	Montgomerie	Dec-10		Hawaii Community at Large
Jonathan	Price	Dec-10		Scientific Research
Pi'i	La'eha	Dec-10		Cultural Resources
Scot	Sanderson	Dec-10		Hawaii Community at Large
Chris	Yuen	Dec-13		Natural Resource Management
Darus	Ignacio	Nov-14	Feb-16	Recreation
Paki	Nahale-a	Nov-14		Education
Robert	Nishimoto	Nov-14		Scientific Research
Judi	Steinman	Nov-14		Laupahoe Community at Large

The Final Environmental Assessment will be available for your review when published. Thank you again for your comments and for your participation in the environmental review process.

Sincerely,

David Smith
Administrator, Division of Forestry and Wildlife

Deborah L. Chang
P.O. Box 202
Paʻauilo, HI 96776
April 7, 2016

Ms. Tanya Rubenstein
Natural Area Reserves Project Coordinator
Department of Land and Natural Resources, Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, HI 96813

Dear Ms. Rubenstein:

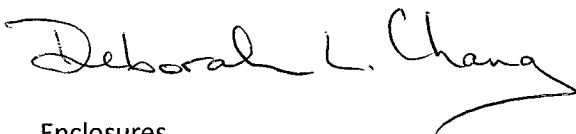
SUBJECT: Draft Environmental Assessment for the Laupāhoehoe
Forest Draft Management Plan

As an advocate for the preservation, protection, and appropriate use of historic Hawaiian trails, I have a few comments:

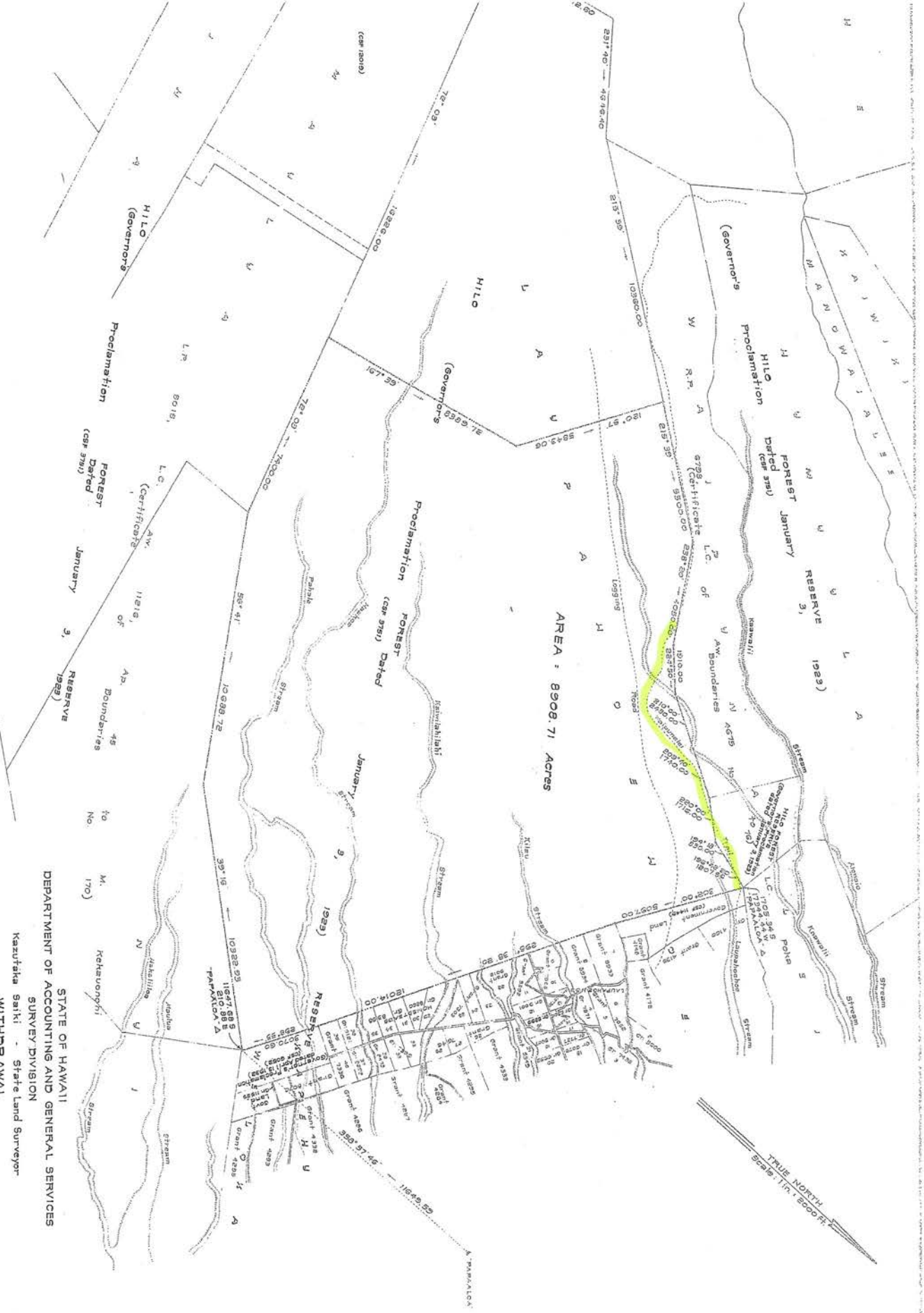
- The lack of identification of ongoing cultural practices within this forest reserve is probably due in large part to its limited accessibility via motor vehicles and lack of well-marked, easily traversed paths. Despite the limited current use, I appreciate the commitment on p. 72 that "...conservation fencing will incorporate gates or step-overs at known access points or along historic trails...."
- As for historic trails and roads, I hope that staff and researchers will remain vigilant to the remains of the Waipunalei Trail as they do their work. Clearly vegetative cover can make it quite difficult to locate. The Historic Properties Field Inspection Report for the subject Draft Management Plan states on p. 3 that the Waipunalei Trail is "...outside the currently proposed project areas..." and that it is "...shown running inland to either side of the Laupāhoehoe and Waipunalei boundary" on Registered Map 2682. Portions of this trail are also clearly shown to be located within Laupāhoehoe Forest Reserve on H.S.S. Plat 799-B. The trail is referred to as "Old Waipunalei Road" with a metes and bounds description and map in C.S.F. 21,799. I remain hopeful that physical remains of the Old Waipunalei Road can still be found. It appears from the maps to be fairly near Blair Road, which will likely be used as a primary access for staff and researchers throughout the 15-year management period covered by the Laupāhoehoe Forest Draft Management Plan.

Many historic roads and trails have been lost and forgotten. At least in the state-owned forest reserves, we have the opportunity to preserve that part of our history and culture.

Mahalo for your consideration,



Enclosures



STATE OF HAWAII
 DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
 SURVEY DIVISION
 Kazutaka Saiki - State Land Surveyor
 WITHDRAWAL
 PORTION OF HILO FOREST RESERVE
 (Governor's Proclamation dated January 3, 1923)
 Laupahoehoe, North Hilo, Island of Hawaii, Hawaii
 Scale: 1 in. = 2000 ft.
 Map Compiled by I. Sakamoto
 May 4, 1975

For description, see CSF 19,530
 H.S. Plat 799-B
 21' x 32' = 4.67 sq. ft.

C.S.F. 21,799

PORTION OF THE GOVERNMENT LAND OF LAUPAHOEHOE
Laupahoehoe, North Hilo, Island of Hawaii, Hawaii

SEE CSF 2729-A, 11,449, 18,630, 19,616, 19,617, 19,996

DINR
3-17-93
261-H

✓

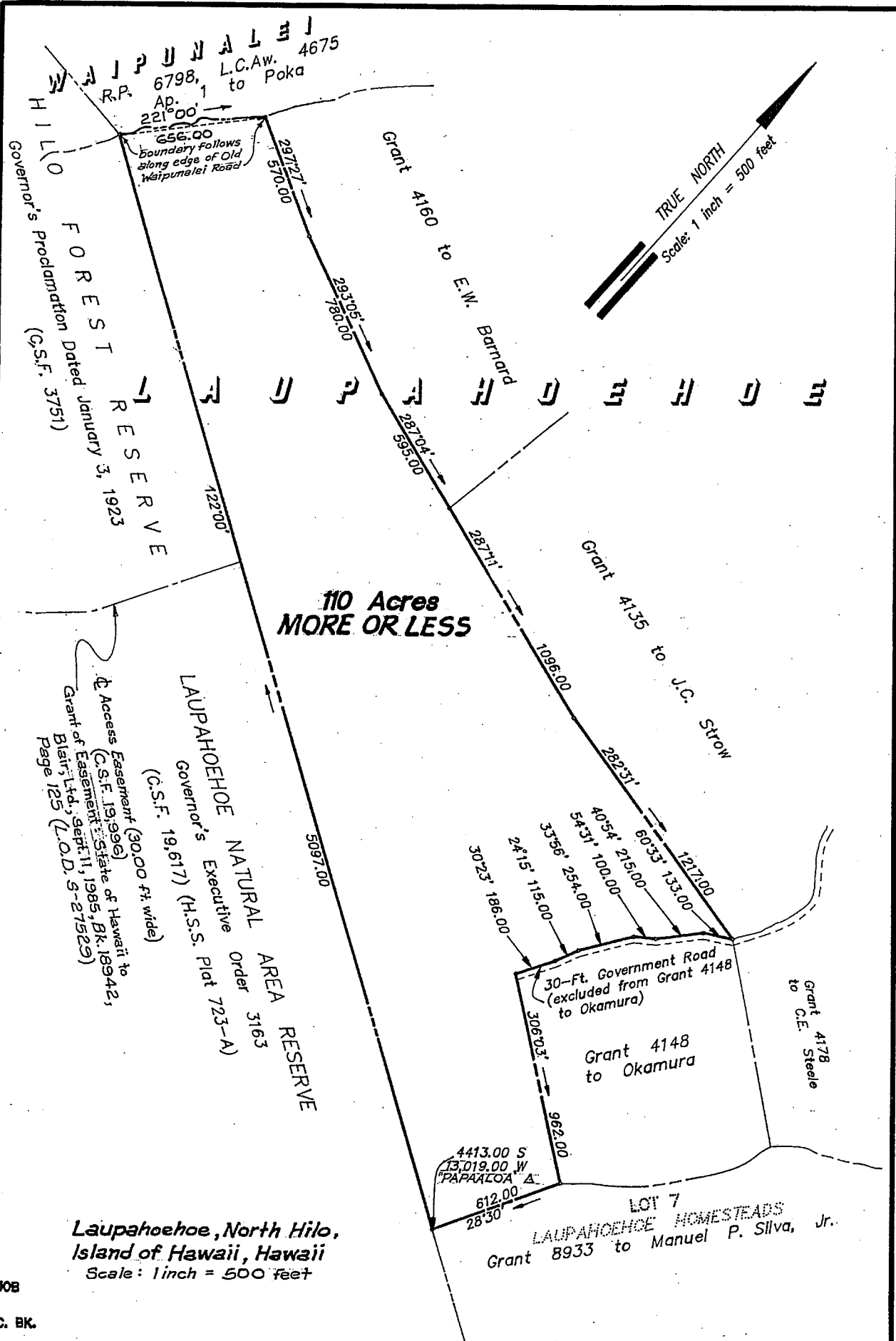
October 28, 1992

- | | | | |
|-----|------|-----|---|
| 11. | 33° | 56' | 254.00 feet along the west side of 30-Foot Government Road; |
| 12. | 24° | 15' | 115.00 feet along the west side of 30-Foot Government Road; |
| 13. | 30° | 23' | 186.00 feet along the west side of 30-Foot Government Road; |
| 14. | 306° | 03' | 962.00 feet along the south end of 30-Foot Government Road and Grant 4148 to Okamura; |
| 15. | 28° | 30' | 612.00 feet along Grant 8933 to Manuel P. Silva, Jr. to the point of beginning and containing an AREA OF 110 ACRES, MORE OR LESS. |

SURVEY DIVISION
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
STATE OF HAWAII

By: Lawrence T. Murakami
Lawrence T. Murakami
Land Surveyor gm

Compiled from survey and data provided by R. M. Towill Corporation, CSFs 2729, 2729-A, 3751, 11449, 12018, Govt. Survey Reg. Maps 2256 and 1861, HTS Plats 723-A, 724, 799, 799-B and other Govt. Survey Records.



JOB
C. BK.

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
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CONSERVATION AND COASTAL LANDS
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ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAIHOLAWA ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

Ms. Deborah L. Chang
P.O. Box 202
Paauilo, HI 96776

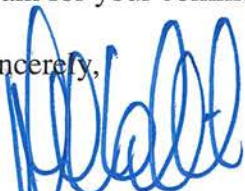
Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan

Dear Ms. Chang:

Thank you for the letter dated April 7, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate your review, your comments, and the additional maps you provided. Specifically, we acknowledge your statement that the lack of identification of ongoing cultural practices is probably due in large part to limited accessibility via motor vehicles and lack of well-marked easily traversed paths and your appreciation that conservation fencing will incorporate gates or step-overs to facilitate public access. We also confirm that staff will remain vigilant for remnants of the Waipunalei Trail whenever they conduct work in that portion of the Laupāhoehoe Forest, and should they discover any evidence of the trail they will take appropriate steps to document its presence and to avoid damage to the feature.

The Final Environmental Assessment will be available for your review when published. Thank you again for your comments and for your participation in the environmental review process.

Sincerely,


David Smith
Administrator, Division of Forestry and Wildlife

Ms. Tanya Rubenstein
DLNR-DOFAW
1151 Punchbowl St. Rm 325
Honolulu Hi, 96813

April 5, 2016

Dear Ms. Rubenstein,

I appreciate the opportunity to comment on the Laupahoehoe Forest Joint Management Plan DEA. I understand there is a need to provide hunting lands in Game Management Areas. And equally important is hunter access to areas that are invaded by alien plants and therefore not good quality native forest/watershed. I consider hunter access to be one of the biggest issues facing forest managers and I believe it needs to improve markedly.

Page 47 of the DEA describes the forest below 3,000 ft. elevation as infested with alien weeds. I have been in that area and I agree it is not worth fencing and most if not all of it should be available for hunting. So should not the area above 3,000 ft. be fenced off to exclude the pigs? It seems that the North and South fenced areas could be connected by fence just above 3K ft elevation. I am uncertain where an upper fence would be needed since I am unfamiliar with that area. I am sure DOFAW staff could choose an appropriate alignment for that, that might leave some upper elevation hunting area.

Page 53 points out that there is no good data documenting hunter use of Laupahoehoe Forest. So how do we know that they hunt in the area above 3K ft.? I am opposed to leaving pigs in high quality native forest (as documented in the EA) when they should be fenced out. The *Ceratocystis fimbriata* fungus may cause extensive damage to ohia forest State-wide, killing ohia and opening up the canopy with light gaps, encouraging invasive weeds to establish, facilitated by feral pig disturbance of the soil. We cannot continue to cut up our best native forest into smaller and smaller fenced areas. Rapid Ohia Death may kill many susceptible ohia trees leaving only those that have some resistance. Do we know which those are in Laupahoehoe? Of course not. The more forest we leave intact, the better the chance is of it (and the watershed they form) surviving a possible fungus epidemic.

Aloha,

Patrick Conant
Puna, Hawaii

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
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AQUATIC RESOURCES
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FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

Mr. Patrick Conant
Puna, Hawaii
plasticcomment@hawaiiintel.net

Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan

Dear Mr. Conant:

Thank you for the email dated April 5, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate your review of the Draft Management Plan and your comments regarding the importance of hunter access to low-quality forest and the need to protect high-quality native forest from ungulates. We acknowledge your recommendation to fence the area above 3,000 ft. (e.g., the forest less invaded by alien weeds) and your opposition to pigs remaining in high quality native forest. We agree with your concerns regarding the threat of Rapid Ohia Death and your argument that the more forest we leave intact, the better the chance it has to survive a possible fungus epidemic.

The proposed conservation units were not selected based solely on hunter use or non-use of an area, but instead reflect proposed management actions that can realistically be implemented over the next 15 years, based on our best estimates of funding and resources available over that time period. Currently, approximately 35 acres within the Laupāhoehoe Forest is fenced and the Management Plan proposes to greatly expand the protected area to approximately 2,659 acres, prioritizing areas of intact high quality native forest. If we are able to fully implement the Management Plan over the next 15 years, future Management Plans (2031 and beyond) may identify opportunities to expand the conservation units.

The Final Environmental Assessment will be available for your review when published. Thank you again for your comments and for your participation in the environmental review process.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Smith".

David Smith
Administrator, Division of Forestry and Wildlife

From: thomasyoung2@hawaiiantel.net [mailto:thomasyoung2@hawaiiantel.net]
Sent: Sunday, April 03, 2016 8:13 AM
To: Rubenstein, Tanya
Subject: D E A Laupahoehoe Project

Ms Rubenstein

In the DEA you mention flume remnants that are still visible in the eastern section of the project area. I started working for Laupahoehoe Sugar Co. in 1967 left then returned in 1972. I had contact with a lot of old timers working at Laupahoehoe. I used to hunt this area and ran across these ditches on many excursions in this area. I asked the older workers about these engineering features. I was told that prior to 1945 the plantation had extensive water harvesting ditches in the forest to gather water and marshal it to a spot called water puka within the growing area. There the water was stored and carefully directed through permanent and portable flumes to transport the cut cane toward the Papaaloa mill site. The history of these water conveyances should be found in the archives of Theo H. Davises. The water puka was about two acres and 20 foot deep, it should be still there unless the current owner has filled it in. The DLNR should have mapping that would help if you are interested. Water liscences were issued to sugar Co. starting around 1910.

--

Thomas Young

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
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FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAIHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 9, 2016

Mr. Thomas Young
Thomasyoung2@hawaiiantel.net

Subject: Comment Letter on Draft Environmental Assessment (DEA) for
Laupāhoehoe Forest Draft Management Plan

Dear Mr. Young:

Thank you for the email dated April 3, 2016 on the DEA for the Laupāhoehoe Forest Management Plan. We appreciate your review and your comments regarding the flume remnants found in the eastern section of the project area. The additional information is quite interesting, and we plan to follow up to see if any related features remain present within Laupāhoehoe Forest and to further document the historic aspects.

The Final Environmental Assessment will be available for your review when published. Thank you again for your comments and for your participation in the environmental review process.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Smith", is written over the word "Sincerely,".

David Smith
Administrator, Division of Forestry and Wildlife

Appendix D.

Historic Properties Field Inspection Report Laupāhoehoe Forest Draft Management Plan

Historic Properties Field Inspection Report

Laupāhoehoe Forest Draft Management Plan

Laupāhoehoe Natural Area Reserve and the Laupāhoehoe Section of Hilo Forest Reserve
Laupāhoehoe, North Hilo, Hawai'i Island (TMK: (3) 3-7-001: 002 and 012)

Prepared by Holly McEldowney, PhD

Martha Yent, M.A

Tracy Tam Sing, M.A.

Division of State Parks

Prepared for

Division of Forestry and Wildlife

Department of Land and Natural Resources

State of Hawaii

February 2016

At the request of the Division of Forestry and Wildlife (DOFAW), three archaeologists from the Division of State Parks conducted field inspections of selected areas within the Laupāhoehoe Natural Area Reserve and the Laupāhoehoe section of Hilo Forest Reserve that could be affected by project components proposed in Laupāhoehoe Forest Management Plan (Figs. 1 and 3). The inspections were conducted to assess the probability of historic properties within these potentially affected areas and to provide a basis for recommending any further steps needed to identify and appropriately manage historic properties within the project area. These recommendations would also provide DOFAW guidance on steps needed to comply with the State of Hawaii and federal historic preservation laws. All inspections took place between May 26 and 28, 2015 with the three authors of this report being the principle investigators. All report figures, including illustrations and photographs, are in the appendix.

Four areas were selected for inspection because observations by DOFAW staff or historic records indicated a higher probability of historic properties in these areas (Figs. 1-3). The first inspection covered a transect running roughly along the 3,500 to 3,580 ft. elevation contours where a proposed conservation unit would be fenced in the wet rain forest zone (Figs. 14 and 15). The second inspection ran almost the entire width of Laupāhoehoe Ahupua'a at a higher elevation (5,000 to 5,080 ft. elevation). The route roughly corresponds with the early 1900s "Maulua Trail" use drive cattle or from a ranch in the south to Humu'ula where more established routes eventually lead to markets. Included in this inspection was the area called "Shack Camp" at the southern end of Maulua Trail and adjacent to the boundary between the

lands of Maulua and Laupāhoehoe (Figs. 26-28). The area served as a cattle corral and ranch station. Proposed management uses of this area include establishing a trail roughly corresponding to the historic trail to provide access for conservation and reforestation efforts as well as recreation. A camp site is proposed at Shack Camp to accommodate DOFAW staff and volunteers working on these projects.

The third inspection focused on the intersection of surveyed boundaries for the lands of Laupāhoehoe, Waipunalei, and Humu'ula. Boundary Commission testimonies recorded in 1875 to help establish boundaries for the privately held land of Waipunalei refer to a traditionally named place at this intersection which included a pool and place where early 1800s bullock hunters lived while working (Figs. 7, 8, 10, 12, 13). The site sits at an elevation between 5,540 and 5,560 ft. and is included in one of the proposed forest restoration areas. The fourth inspection included the area where a monument was erected in 1934 to commemorate David Douglas, a famed Scottish botanist, who died in a bullock pit (i.e., pit trap) at or near the monument site in 1832 (Figs. 8, 10, 40, and 41). This area is within the highest elevation forest restoration area at approximately 6,000 ft.

Ground visibility varied among the four areas inspected. Visibility was best along most of the Maulua Trail route and at the traditional place adjacent to the boundary intersections where tall-stature and dense stands of tropical ash, planted in 1936 for timber, restricts growth of understory species and feral pig rooting helps eliminate ground cover (Figs. 17 and 18). Pig rooting also decreases the probability of low surface features, midden scatters, or discarded objects, from the pre-contact or historic periods, remaining intact and visible. Visibility was worst, both immediately and at any distance, in the Shack Camp area and in that at or near the David Douglas monument (Figs. 27, 28, 33, 39, and 40). In both areas a thick cover of kikuyu grass, which had not been grazed for a while, obscures the ground almost entirely. To be seen, objects or features needed to exceed the height of the dense grass clumps or be stumbled upon. Visibility was moderately good along the lower, wet forest transect (Figs. 14 and 15). Immediate ground surfaces were mostly visible, mostly due to pig damage disrupting ground cover, but wider views were less clear at a distance because of the density of understory and sub-canopy plants.

A major portion of the largest Forest Restoration Site, that abutting Humu'ula and Waipunalei to the north of Laupāhoehoe, was surveyed by State Parks archeologist for a proposed reforestation project in 2005.¹ The project was eventually canceled. Three transect were surveyed by foot within the Laupāhoehoe portion of this previous project area and no historic properties were identified along any of them (Fig. 4). Ground visibility during the survey was restricted by dense thickets of 'ākala (Hawaiian Raspberry) and

¹ McEldowney, Holly, Alan Carpenter, and Martha Yent. 2006. *Historic Properties Identification and Field Report, Upper Laupāhoehoe and Humu'ula Sections, Hilo Forest Reserve Reforestation Project*. Manuscript prepared by the Division of State Parks for the Division of Forestry and Wildlife, Department of Land and Natural Resources.

dense patches of grass. Much of the area had been or was actively being disturbed by pig rooting (Figs. 5-6).

After the field inspection was completed, the Hawai'i Island Cultural Resources Commission was consulted on the Laupāhoehoe Forest Draft Management Plan. Members questioned whether the historic Waipunalei Trail was in the project area and if any remnants of the trail or features associated with its use could be affected by proposed management actions (Ltr. Chang to Rubenstein, Jan. 22, 2016). The three historic maps examined place the trail outside the currently proposed project areas as do more recent depictions shown on Tax Map Key maps and the USGS Quadrangles (Figs. 3, 2, 4, 7, 9, and 12). In Boundary Commission testimonies recorded in 1875 for Waipunalei Ahupua'a, a testifier named Paka describes an old trail running into the woods called Kalaikukui. It was said to run along the mauka corner of the land of Hakoa which was bounded by Laupāhoehoe on the south and Waipunalei on the north. This route is roughly similar to the trail later labeled the Waipunalei Trail and shown running inland to either side of the Laupāhoehoe and Waipunalei boundary (Fig. 12). A recommended mitigation measure for the management plan includes preparing a guidance document that will help management staff and volunteers recognize these types of features should any be found in unexpected areas and what to do should they be found.

Identified Potential Historic Properties

The following five potential historic properties (Figs. 1-3) were identified during the inspection and recorded to some extent (documentation will be incorporated in the proposed inventory survey plan, in preparation):

- 'Auwai or Ditch Feature: Segments of a probable ditch or 'auwai had been previously identified by DOFAW staff on the route used to access existing endangered species enclosures in the lower elevation, wet rain forest. Potentially it also crosses the down-slope perimeter fence of the proposed conservation unit in this area. Archaeologists on the team agreed that it was a manmade feature and that a ditch seemed to be the feature's most likely function given that appeared to be a long open trench cut into the rocky, soil embankment of a ridge and at angles and elevations conducive to water flow (Fig 16). Portions have collapsed while others were no longer well defined due to erosional slippage or filling. The feature could be followed for a total of 51 m (167 ft.) with widths varying from 150 to 70 cm (59 to 27.5 in.) and depths from 170 to 30 cm (66 to 12 inches). The purpose of a ditch at this elevation is puzzling. It is above the productive agricultural zone for native Hawaiian and subsequently introduced crops given cooler temperatures at this elevation and the high percentages of cloud cover per hour and day throughout the year. Some association with use of the Laupāhoehoe Homestead lands for

ranching or sugar cultivation is possible but those lands are at least 2 miles downslope of the 'auwai (Fig. 12). It is also possible that it was somehow associated with traditional Hawaiian uses of the lower forest which involved bird catching or activities needed to gather or process forest resources.

- Maulua Trail Section: A few recognizable sections of the Maulua Trail had been identified previously by DOFAW staff along the trail's route shown on USGS Topographic maps (Fig. 4). The trail first appears on a 1916 map running roughly north from Shack Camp located on the Maulua-Laupāhoehoe boundary (Figs. 10-13). It is labeled going to Keanakolu, ranch station in Humu'ula. Cattle were presumably driven from the fenced complex at Shack Camp along the trail to lands with more accessible routes to steamer landings and other markets or became a short-cut for ranch hands moving to and from the coast or other ranch lands. The trail was recognizable when the edges were defined by stone alignments or curbing, cuts in embankments or slopes where the trail crossed ridges or uneven terrain, or leveled segments of stone and soil in flatter areas (Figs. 20-25). Three trail sections were described during the field inspection. Trail width varied from 3.5 to 1.4 m (4 to 11 ft.) with most sections being 2.5 m (8 ft.) wide. The longest segment recorded was 47 m (154 ft.) long and included a distinct ramp feature cut into a sloping ridge face and a retaining wall feature near its base (Fig. 19). Attempts to follow the trail beyond the immediate segment mapped were unsuccessful.
- Shack Camp Ranching Complex: What was labeled and called "Shack Camp" as early as 1916 was a 125 acre fenced area leased from the Territory of Hawaii by Kukaiau Ranch which was running cattle in neighboring Maulua (Figs. 10-13). The area was desirable because it had at least two water sources, a pond and spring. The only features of this camp found during the inspections were the small house (or shack), feeding and watering troughs, scattered fruit trees, a small orchard of fruit trees on a rise above the house, a pole for the telephone line installed by Kukaiau Ranch by 1922 to connect Maulua and ranching holdings at Umikoa, and the large pond shown on maps (Figs. 26-34). The house has collapsed and is badly deteriorated as are the troughs. The spring shown on a 1916 map was not located. As evident during the inspection and on aerial photographs from the 1960s and 1970s, portions of the camp pasture area have been bulldozed to create earthen reservoirs and roads.
- Traditional Place at Ahupua'a Boundaries: The Commission of Boundaries, generally called the Boundary Commission, was established in 1862 to certify the boundaries for ahupua'a awarded to the major Ali'i in the Mahele of 1948. To help verify the traditional boundaries of these lands, the commission heard testimony from those having personal knowledge of these lands, the boundaries, or place names along the boundaries. Two native Hawaiians, Paka and Hoahimoa,

testified that a place named Kulanihakoi (also transcribed as Kulanikakoi and Kulanikekoi) was the mauka boundary of Waipunalei and Laupāhoehoe. Paka testifies that there is a water hole at this location and Hoahimoa mentions having lived at Kulanihakoi while shooting bullock on the lands of Humu'ula (Boundary Commission Book B: 367 and 368). The survey map prepared to verify these boundaries in 1875 depicts the location of Kulanihakoi and the waterhole (Figs. 7 and 8). A 1916 map of the area shows a Forest Reserve Monument marking the boundary of the reserve at this location, labels the place Kulanihakoi, and depicts a water hole adjacent to the boundary (Fig. 10). The waterhole is still shown on a 1921-1922 map without the place being named (Fig. 12 and 13). The *Hawaiian Dictionary* translates Kū-lani-hā.ko'i as a "Mythical pond or lake in the sky, its overflow comes to the earth as rain."² The name can also be used to imply one having been drenched by water. *A Dictionary of the Hawaiian Language* has the following: "[Ku, the god, Ku, represented in rain and storm, lani, heaven, and hakoi, heavy.] What is above or on high; a supposed place in the heavens from which the waters of rain came; the windows of heaven:...."³ No specific reference was found suggesting that this particular place is associated with this belief, but it is a possibility.

The substantial ironwork Territorial Forest Reserve monument (i.e., post) indicated on the maps was easily found during field inspection as was a low, broad depression that could have been the water hole (Figs. 35 and 36). Sediments in the leveled base of the depression may indicate that water still ponds there although it was dry at the time of the inspection. Directly inland was a natural rock formation next to the base of what was once a very large koa tree (Fig. 37). The surface patterns of a number of rocks in the outcrop were very distinct (Fig. 38). It would not be surprising if they were associated with particular beliefs or customs although no specific information was found to substantiate this possibility. No other features of note or evidence of past use were seen in the area.

- David Douglas Monument: Stone monument constructed in 1934 to honor the Scottish botanist, David Douglas, is relatively well known and visited by those venturing along the upper Mauna Kea road from Waimea to the Saddle Road. A trail leading to the monument is maintained and marked with signage. The eight-foot tall, triangular and tapered stone pillar sits on a triangular base and is topped with a single rock and sits in an open, grassed area (Fig. 41). Bronze plaques dedicate the monument to Douglas, list those initially responsible for its construction in 1934, and, installed in 2014, commemorates the 108th anniversary of his death and 100th anniversary of the publication of his journals (Fig. 40 and 41). If any evidence of bullock pits or other uses of this

² Pukui, Mary Kawena and Samuel Elbert. 1977. *Hawaiian Dictionary*. Honolulu, University of Hawaii Press, 165.

³ Andrews, Lorrin. 1922. *A Dictionary of the Hawaiian Language*. Revised by Henry H. Parker. Honolulu, Board of Commissioners of Public Archives, Territory of Hawaii.

area still exists in this portion of this forest restoration area, they are well hidden by dense grass and underbrush (Fig. 39 and 40).

Other than the features described above, no archaeological sites or historic properties were found in areas covered during these field inspections, including those areas where ground surfaces were sufficiently visible. These observations support general predictive models that the probability of archaeological sites in these upland forested areas is very low. Known uses of forested areas, mostly documented in the historic record, were primarily transient, intermittent, or periodic and left few durable remains behind. Thick vegetation growth and years of ground disturbance by feral animals, particularly pig rooting and wallowing, have likely obscured or obliterated any cultural deposits or stone alignments that might have remained from these uses. The findings also underscore the results of other studies along the upper portions or margins of the forest reserve. Historic properties remaining in these areas mostly reflect periods of wild cattle hunting, ranching, or early forestry and watershed initiatives.

Recommended Documentation and Treatment Actions

The following steps are recommended to more thoroughly evaluate the historic properties identified and propose ways to mitigate adverse effects potentially resulting from actions taken under the Laupāhoehoe Forest Management Plan. Figure 2 depicts location of historic properties and proposed projects in the draft management plan. Potential inventory and mitigation commitments are outlined in the table on the following page.

- 'Auwai or Ditch Feature: Additional field work should be conducted to complete documentation and evaluation of this unusual feature. Particular effort should focus on exploring areas up and down slope of the feature to see if additional ditch segments exist which might clarify the features extent and purpose. This survey should provide sufficient information to determine the site's boundaries so that the ditch can be avoided when fences delineating the proposed Conservation Unit are installed and unit maintenance work is performed. The recommended mitigation treatment for this feature is avoidance. As part of the survey, a records search should be conducted targeting documents pertaining to historic land uses of Laupāhoehoe which might help explain the need for a ditch at this elevation. Archaeological reports for surveys conducted within the lower forest and upper agricultural zones along the Hilo-Hāmākua Coast should also be reviewed to see if similar features were reported elsewhere and more specific purposes suggested.
- Maulua Trail Section: As with the 'auwai, additional field survey should focus on defining the boundaries of the trail's physical remnants and confirming that others segments do not exist.

Given the thorough and credible search DOFAW staff has already made for trail remnants, the chance of finding many other existing segments is relatively low. The recommended mitigation treatment for this feature is preservation which would require preparation of a plan setting out measures to preserve and potentially interpret the site. If a trail for staff and volunteers is established along the general route of Maulua Trail as proposed, there would be interpretive opportunities to discuss the trail and the region's ranching history.

- Shack Camp Ranching Complex: A more thorough survey of the Shack Camp area and its potential historic components is not feasible nor worth the effort needed to systematically survey such a large area covered in dense, tall kikuyu grass that is also badly rutted by pig rooting. Wooden objects or features that could be present are probably badly deteriorated and any low stone surface features are likely obscured or disturbed by pigs. The initial mitigation measure recommended is preparing a plan that combines preservation treatments for identified components of the complex and an ongoing commitment to record any features found in the future in those areas currently obscured by vegetation. The approaches proposed in the plan would be those feasible in this wet environment and compatible with the broader mission of restoring native forests and conserving native ecosystems.

One element of the plan could be maintaining or restoring the historic character of a limited portion of the original Shack Camp complex. The preservation area would encompass the location of the wooden house (or shack), the fruit tree orchard on the rise southeast of the house, and the stand of imported timber trees immediately south of the shack (Fig. 26). This area could become the focal point of the campsites proposed in the protection and management plan to accommodate support staff and volunteers while still maintaining some semblance of an open pasture and ranch camp that it was historically. The original wooden house, now in ruins, could be demolished and any usable fixtures (e.g., door knobs, etc.) or boards salvaged for reuse. A wooden cabin could be constructed at the location of the original structure that is designed to be generally consistent in appearance with small ranch structures of the early 1900s. The cabin could provide shelter for support staff or volunteers when needed, storage for equipment and supplies, and be available by reservation for public use. The fruit trees could be minimally maintained as long as they remain healthy and the large timber species kept unless they pose a hazard. Interpretive material focusing on the complex and adjacent lands could help staff and volunteers better understand the region's history. Other components of the historic complex, such as the pond and spring shown on the historic maps, could also be considered for inclusion in the preservation plan if additional assessments suggest this warranted and feasible. A more systematic survey should be conducted of this limited area.

Table 1: Recommended Inventory and Potential Mitigation Actions for Identified Historic Properties

Project Areas	Proposed Project Uses	Identified Historic Properties Recommended Inventory and Potential Mitigation Actions
<p>Laupāhoehoe NAR:</p> <p>Habitat Conservation Units:</p> <p>297 acres</p> <p>1277 acres</p> <p>1071 acres (por.)</p>	<p>Fence Installation</p> <p>Ongoing Management Actions</p> <p>Helicopter Landing Zone</p> <p>Trail Improvement</p>	<p><u>'Auwai-Ditch Feature:</u></p> <p>Complete Inventory</p> <p>Determine Extent of Ditch</p> <p>Propose Buffer to Ensure Protection</p> <p>Propose Preservation by Avoidance as Stipulated in Prepared Plan</p>
<p>Hilo Forest Reserve</p> <p>Laupāhoehoe Section:</p> <p>Three Forest Restoration Sites</p> <p>Conservation Unit (por. 1071 acres)</p> <p>Trail Access (Two Sections)</p>	<p>Forest Restoration Actions:</p> <p>Clearing, Planting, Ongoing Management)</p> <p>Shelter, Primitive Campsites and Ancillary Facilities</p> <p>Fence Installation</p> <p>Helicopter Land Zone</p> <p>Establish Trails</p> <p>Trail Improvement</p>	<p><u>Shack Camp Ranching Complex</u></p> <p>Complete Inventory of Identified Components of Complex</p> <p>Define Boundaries of Preservation and Restoration Area</p> <p>Prepare Preservation Plan, including Restoration of Selected Shack Camp Components</p> <p>Establish Standard Procedures if Remnants of Shack Camp or Other Historic Properties found beyond Preservation/Restoration Area</p> <p><u>Maulua Trail Segments</u></p> <p>Complete Inventory of Known Trail Segments and Potential Additional Segments</p> <p>Prepare Preservation Plan for Trail Segments, including Interpretation</p> <p><u>Traditional Place-Kulanihako</u></p> <p>Conduct Inventory Survey of General Location</p> <p>Determine Protective Buffer for Appropriate Area</p> <p>Prepare Preservation Plan if Feasible and Appropriate</p> <p><u>David Douglas Monument</u></p> <p>Determine Protective Buffer for Area</p> <p>Prepare Preservation Plan, Including Existing Maintenance of Monument Area and Access Trail</p> <p><u>General Project Area</u></p> <p>Establish Standard Practices and Procedures if Historic Properties Discovered during Project in Low Probability Areas</p>

A second element of the plan should establish steps to be followed if historic features are discovered within the Shack Camp complex during vegetation clearing or ground disturbance occurring as part of native forests restoration or conservation efforts. The steps would include providing workers with an overview of the kinds of features or objects potentially encountered and instructions on how to report any finds and their locations. Instructions should include the standard practices leaving any find in place and avoiding the immediate area until the disposition or treatment of feature or object can be determined. Commitment made in the plan should also address the process by which any treatment decisions will be made depending on the kind or scale of the discovery.

- Traditional Place at Ahupua'a Boundaries (Kulanihakoi): The cursory inspection of this traditional place and temporary habitation site was not sufficient to clearly assess which remaining physical features of the area might be characteristic of the named place or if any man-made evidence of past habitation is truly absent as it appeared during the inspection. A systematic survey of the area should be conducted to identify and record any distinct physical features that are reminiscent of those mentioned in the historic records and any evidence of past habitation. In particular, the survey should propose a protective buffer for the potentially significant area so that it can be avoided during forest restoration efforts. If restoring this area becomes an option, a preservation plan should be prepared setting out how a habitat resembling that present in the early 1800s would be established and the precautions needed to avoid adversely affecting known or unidentified historic properties.
- David Douglas Monument: The grounds immediately surrounding the monument and the access trail are currently maintained by DOFAW staff. It is recommended that these established practices continue. Maintaining a cleared area around the monument in this moist environment helps preserve the rock and mortar monument and plaques. As with the Shack Camp Complex, it is not realistic to conduct systematic ground surveys in the vicinity of the monument given the dense kikuyu grass and thick underbrush covering the uneven terrain. Another inspection should be conducted to define an appropriate protective buffer in the immediate vicinity of the monument and access route. The buffer would define the area to be avoided when forest restoration actions are undertaken in the upland-most section of the Laupāhoehoe Forest Reserve. As with traditional place Kulanihakoi, a preservation plan should be prepared if forest restoration actions within the protective buffer become an option or are desirable.

Recommended Compliance Approaches

Actions proposed under the Laupāhoehoe Forest Management Plan are subject to historic preservation review under Hawaii state and federal laws and regulations. Sections 6E-7 and 8, Hawaii Revised Statutes (HRS), and the implementing administrative rule, Chapter 13-275, Hawaii Administrative Rules (HAR), requires any agency to give the State Historic Preservation Division (SHPD), acting on behalf of the Department of Land and Natural Resources, the opportunity to review any project that may affect historic properties. The project shall not commence until SHPD has issued its written concurrence. HRS §6E-7 and 8 applies because the Laupāhoehoe Forest is state land and DOFAW is a state agency. The project is also subject to Section 106 of the National Historic Preservation Act (Title 54 U.S.C.) and its implementing regulations (36 CFR Part 800) because it is partially funded through the federal Hawaii Experimental Tropical Forest project of the U.S. Department of Agriculture Forest Service (USDA-FS). While USDA-FS is technically responsible for complying with the Section 106 project review process, it is preferable to coordinate as closely as possible the approaches taken to state and federal compliance.

Based on the results of this field inspection, credible observations by DOAW staff, and a review of other archaeological work in the general area, it is recommended that DOFAW seek a determination from SHPD that significant historic properties are known or are likely to be present in limited portions of the overall project area and are unlikely in the remaining portions (HAR §13-275-5(b)). If SHPD concurs, DOFAW can propose preparing an inventory survey plan which would set out the methods and approaches to be used in each higher probability area (HAR §13-275-5(c)). These would include conducting systematic surveys to identify any additional sites in these areas, to complete documentation of known properties, evaluate their significance, define site boundaries, and propose mitigation measures. Most historic properties can be avoided when projects components are implemented. Preservation or mitigation plans would be prepared to mitigate any adverse effects as needed. The mitigation plan prepared subsequent to the inventory should include a commitment to follow general practices and procedures if historic properties are discovered during the project in low probability areas.

To comply with federal historic preservation review process, the USDA-FS should consider preparing a Memorandum of Agreement (MOA) in accordance with the law's implementing regulations. The framework of a MOA is better suited to setting out approaches that can be implemented concurrently with those suggested or required by the state-level process. The MOA would establish in the preamble (i.e., "whereas" clauses) the general nature of the project; that there are known historic properties within specific and limited portions of the project area; that historic properties are unlikely in most of the other areas; and that the types of actions needed to implement the project require minimal ground disturbance and their siting is relatively flexible. The MOA stipulations would then commit to those actions proposed in the state-level inventory plan and any anticipated preservation or mitigation measures. These would

include completing work on the known or potential historic properties (e.g., extended survey in immediate vicinity of identified sites, significance evaluations, site boundaries, etc.) and identifying the general plans needed to achieve the potential treatment options. An important stipulation is committing to preparing a general practices and procedures document to guide actions taken if historic properties are discovered unexpectedly during the project, particularly in areas where they are not expected.

Guidance should be sought from USDA-FS staff assigned to assist local Forest Service employees with Section 106 compliance matters. The signatories to the MOA will include the official representing the USDA-FS or U. S. Department of Agriculture and the Hawaii State Historic Preservation Officer. The Department of Land and Natural Resources should be a signatory as an “invited party” because it will be jointly responsible for the project and for fulfilling many of the MOA terms. It also needs to be actively involved should the MOA be amended, terminated, or disputed. Projects included under the MOA should be those that have a reasonable chance of occurring over with the next five to ten years. The MOA can be amended if project priorities or approaches change during this period.

Appendix: Report Figures, Including Illustrations and Photographs

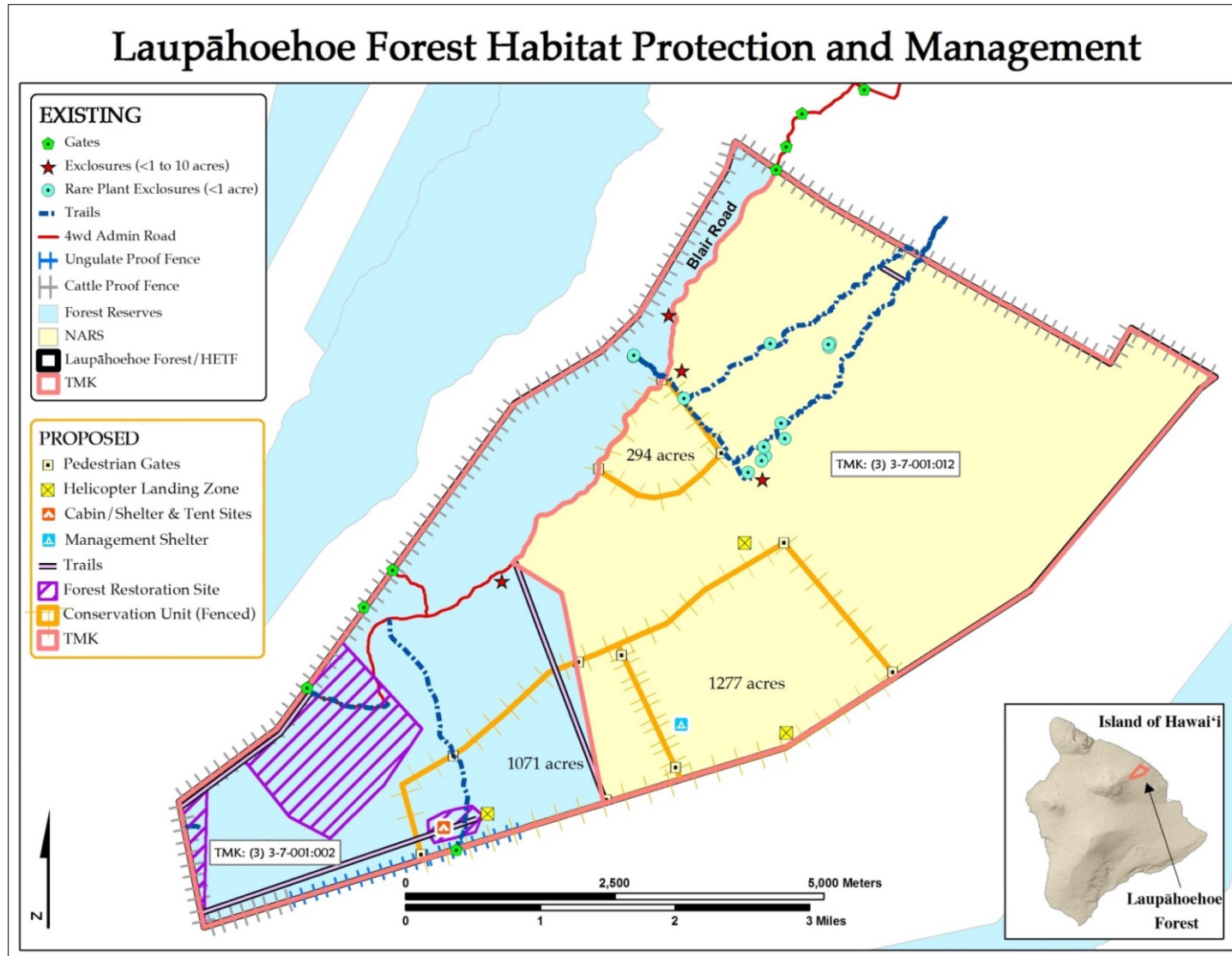


Figure 1: Tax Map Key Designations for the Laupāhoehoe Section of Hilo Forest Reserve (TMK: (3) 3-7-001: 002) and Laupāhoehoe Natural Area Reserve (TMK: (3) 3-7-001: 012).

Laupāhoehoe Forest Historic Properties

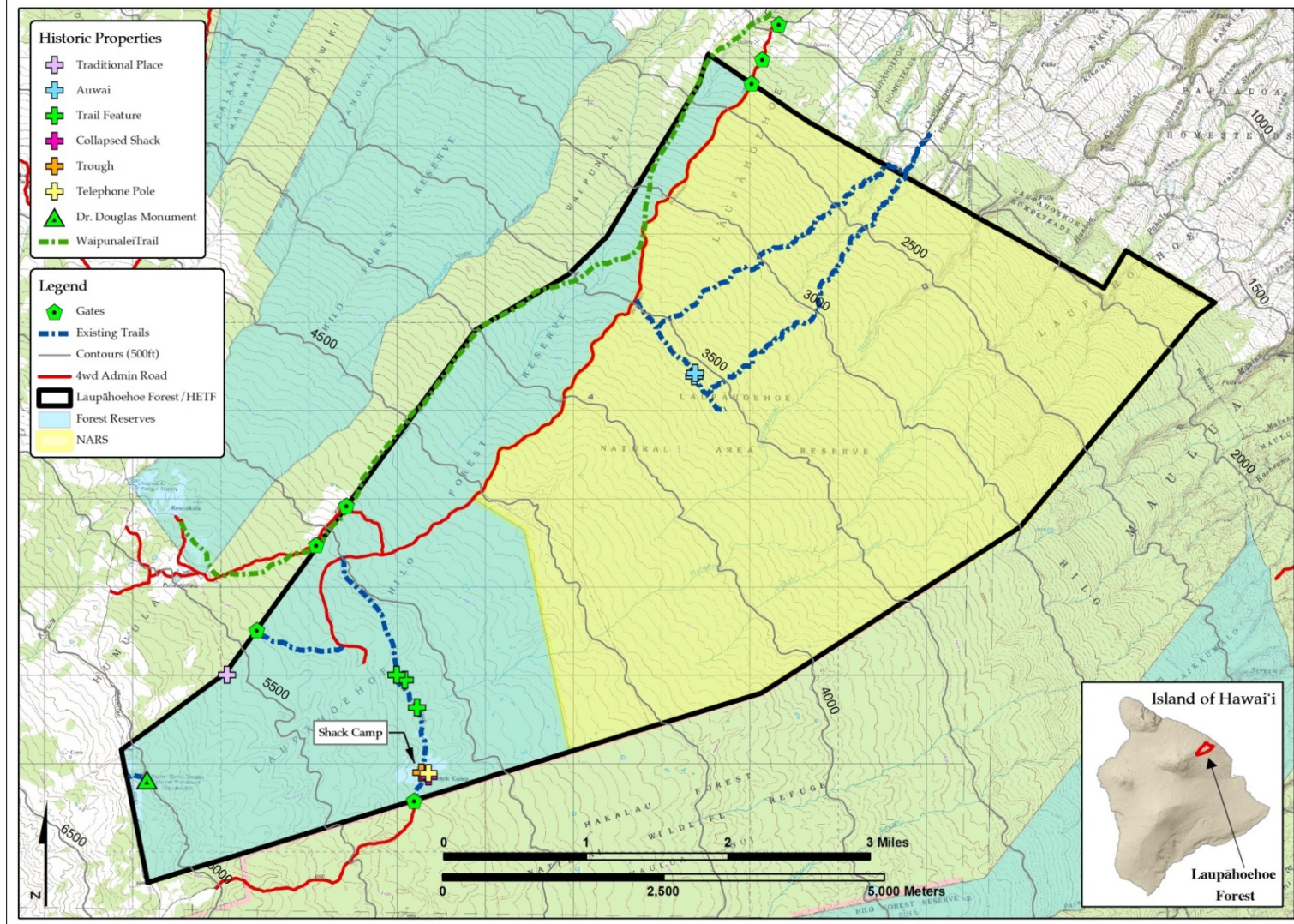


Figure 2: Location of Potential Historic Properties Identified in Laupāhoehoe Section of Hilo Forest Reserve and Laupāhoehoe Natural Area Reserve. Also included are the routes currently used when staff performs management work in the reserves. The blue-dashed trail follows the route of the Maulua Trail as shown on the USGS Topographic Quad (Keanakolu 1982)

EXISTING

- Gates
- Exclosures (<1 to 10 acres)
- Rare Plant Exclosures (<1 acre)
- Trails
- 4wd Admin Road
- Ungulate Proof Fence
- Cattle Proof Fence
- Laupāhoehoe Forest/HETF
- Forest Reserves
- NARS

PROPOSED

- Helicopter Landing Zone
- Cabin/Shelter & Tent Sites
- Pedestrian Gates
- Trails
- Management Shelter
- Forest Restoration Site
- Conservation Unit (Fenced)

Historic Properties

- Traditional Place
- Auwai
- Trail Feature
- Collapsed Shack
- Trough
- Telephone Pole
- Dr. Douglas Monument
- Waipunalei Trail

294 acres

1277 acres

1071 acres

Shack Camp

0 1 2 3 Miles

0 2,500 5,000 Meters

Island of Hawai'i

Laupāhoehoe Forest

Historic Properties Field Inspection Report, Laupāhoehoe Forest

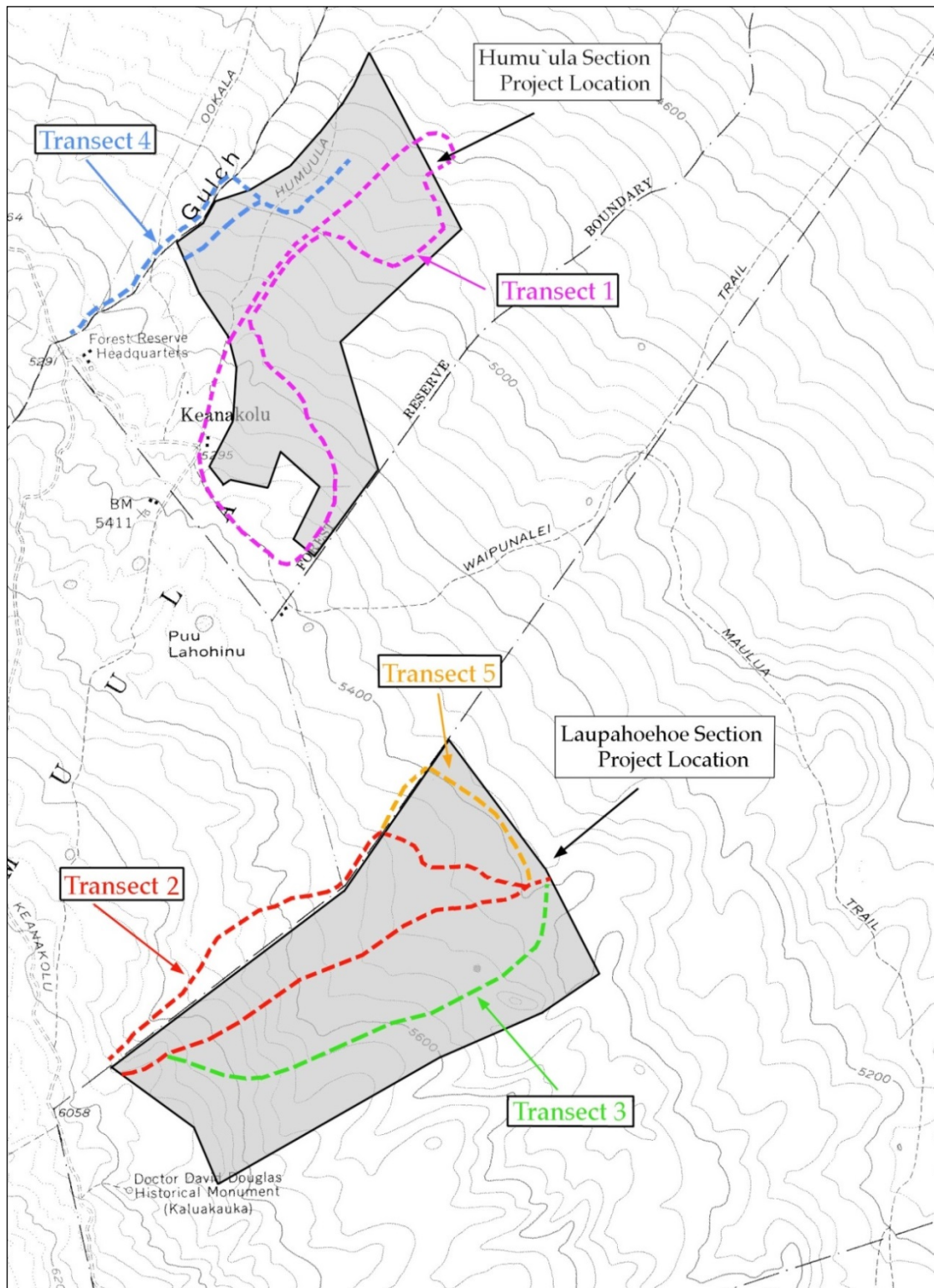


Figure 4: Approximate Routes of Transects Surveyed by State Parks Archaeologist in 2005 for the Forest Restoration Project, Laupāhoehoe. The Laupāhoehoe Section transects (# 2, 3, and 5) sample approximately three quarters of the largest forest restoration site proposed in the current project. No historic properties were found.



Figure 5: Vegetation and Terrain at or Near Proposed Forest Restoration Sites, Laupāhoehoe Section (Views Facing Northeast). Taken during the 2005 survey, the photographs illustrate the ridge and swale formations in the project area, the dense ground cover (upper photograph), and general characteristics of the forest (lower photograph).



Figure 6: Vegetation and Terrain along Northern Boundary of the Forest Restoration Site, Laupāhoehoe Section (Views Facing Southwest). These 2005 photographs illustrate the thick patches of 'ākala covering portions of the project area. The fence in the lower photograph marks the boundary of Laupāhoehoe and Waipunalei with the open pasture being on Waipunalei.

Waterhole at "Kulanihakoi"

Trail Called Kalaikukui

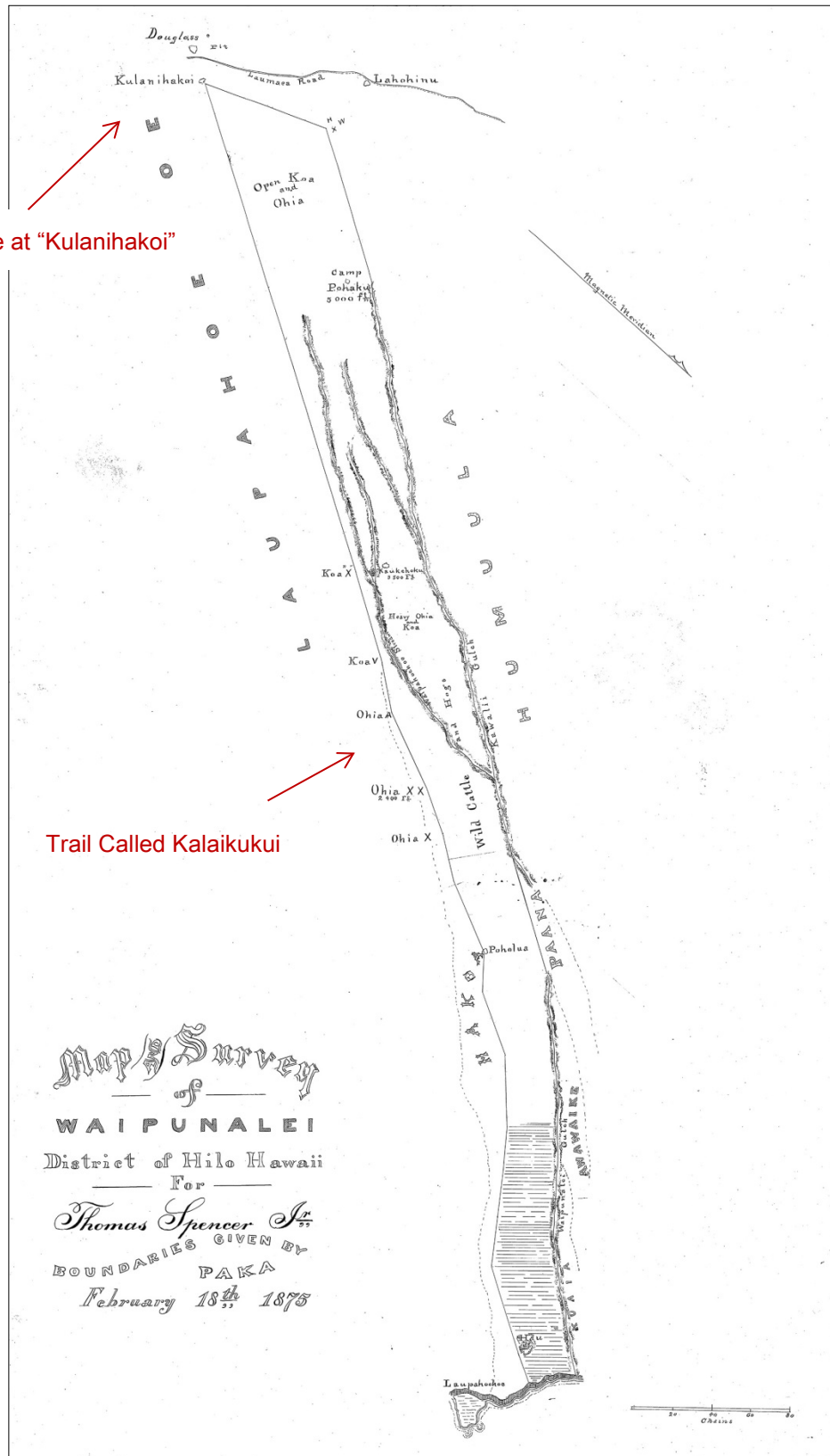


Figure 7: Survey Map Prepared to Certify the Boundary of Waipunalei Prepared in 1875 (Reg. Map 667)

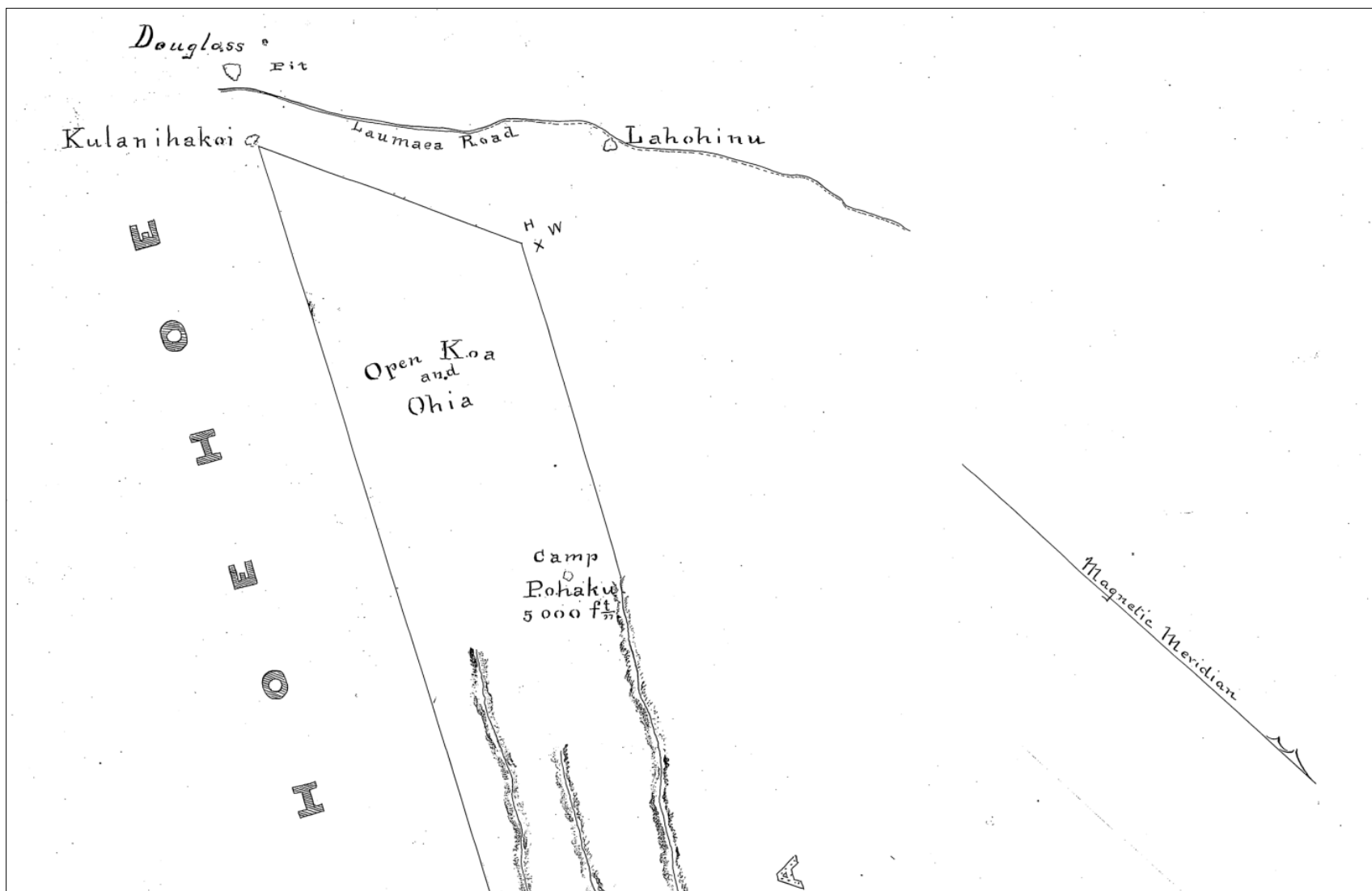


Figure 8: Extracted Section of Waipunalei Ahupa'a Boundary Map Focusing on the Waterhole at "Kulanihakoi" (Reg. Map 667). Unlike other early maps, this one places the upper road across the Mauna Kea slopes makai of the David Douglas pit.

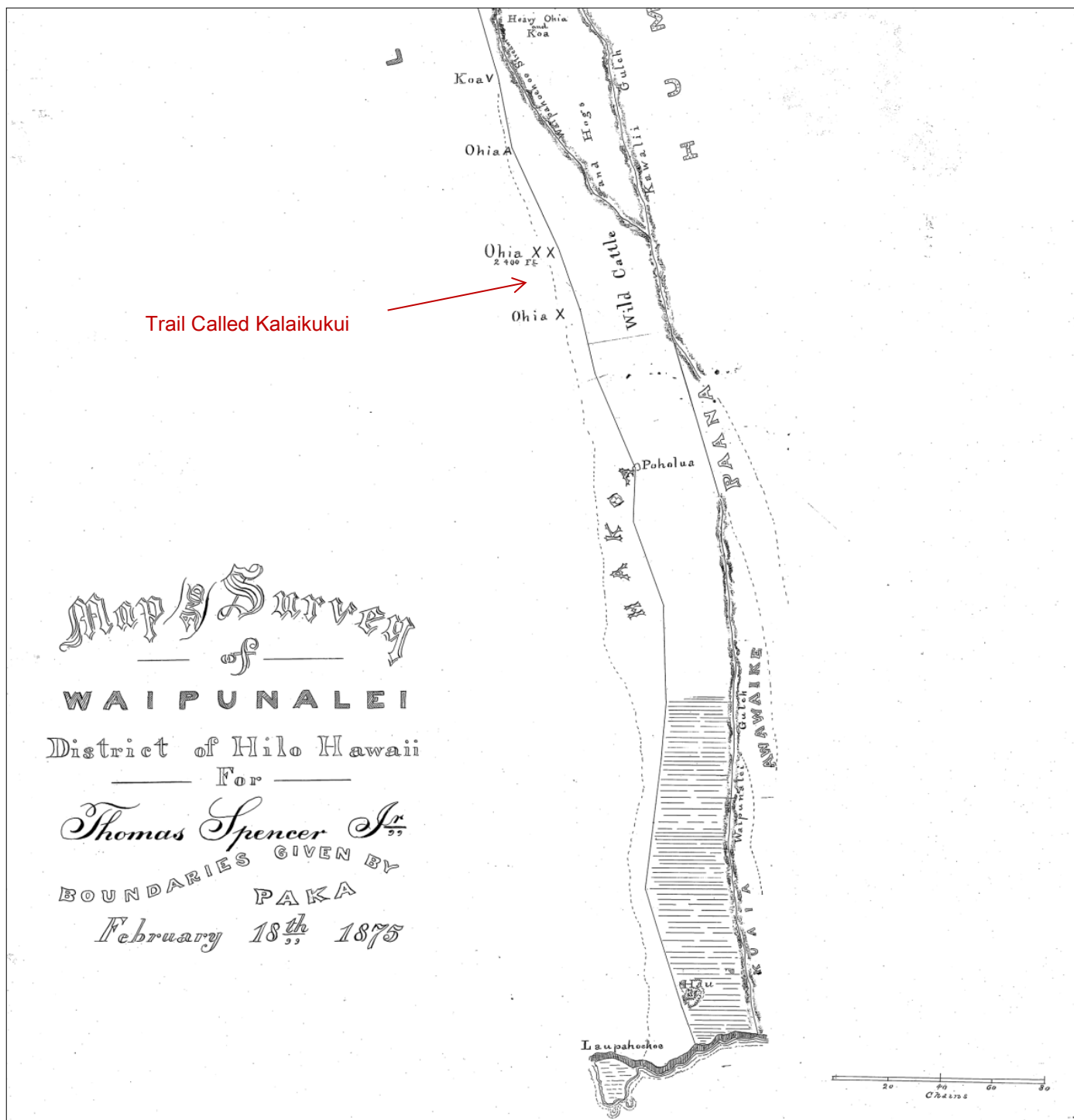


Figure 9: Extracted Section of Waipunalei Ahupa'a Boundary Map Focusing on the Trail Called Kalaikui (Reg. Map 667). The old trail leading into the lower forest was said to follow the boundary between Laupāhoehoe and the land of Hakoā. This trail may have been the forerunner to what was later called the Waipunalei Trail.

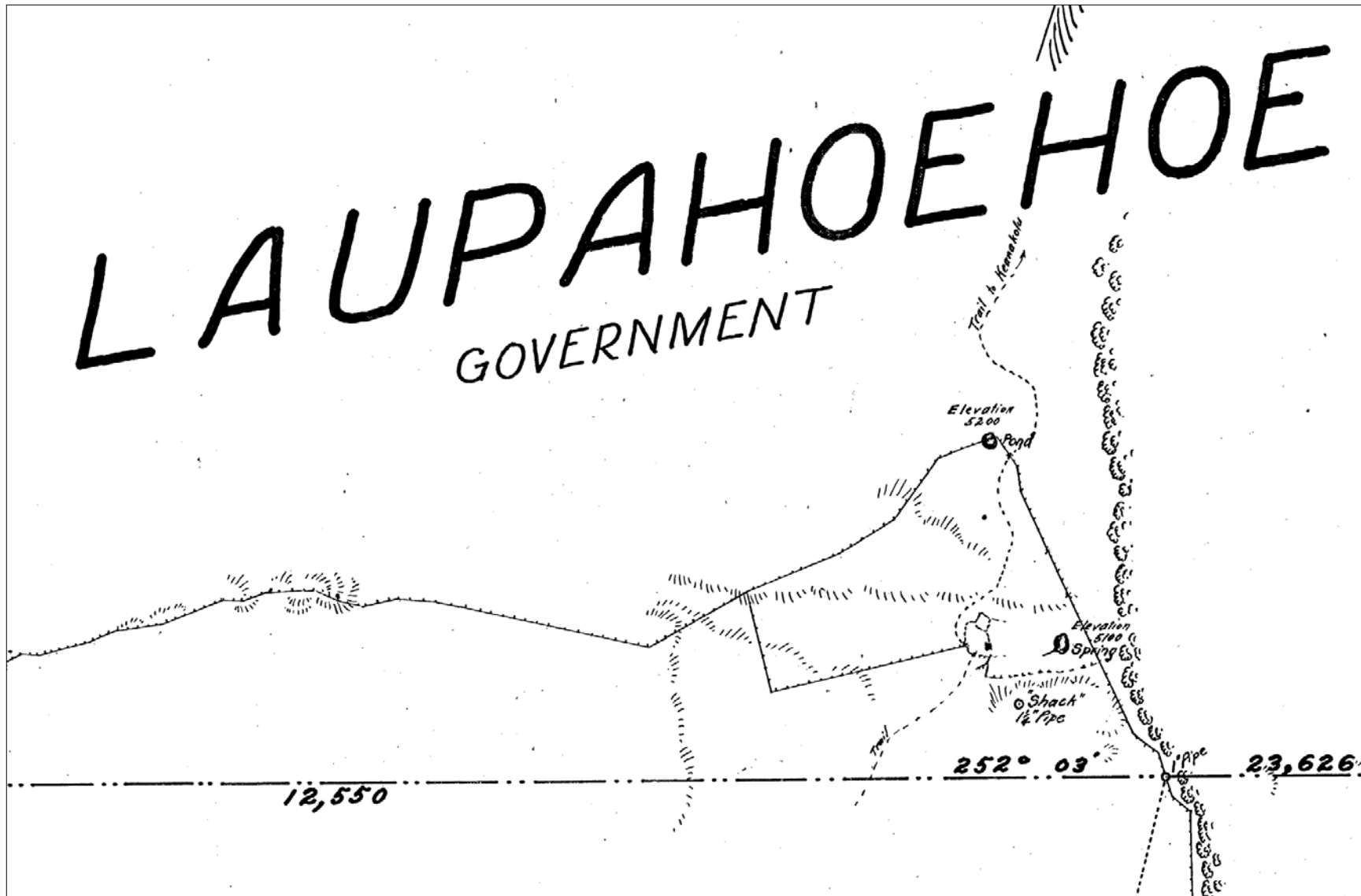


Figure 11: Shack Camp Features as Shown on 1916 Map of the Upper Hilo Forest Reserve (Reg. 2594). The black square appears to represent the shack and the "Trail to Keanakolu" may be the forerunner to what is now called Maulua Trail. The "Pond" was located during the field inspections but not the spring east of the shack.

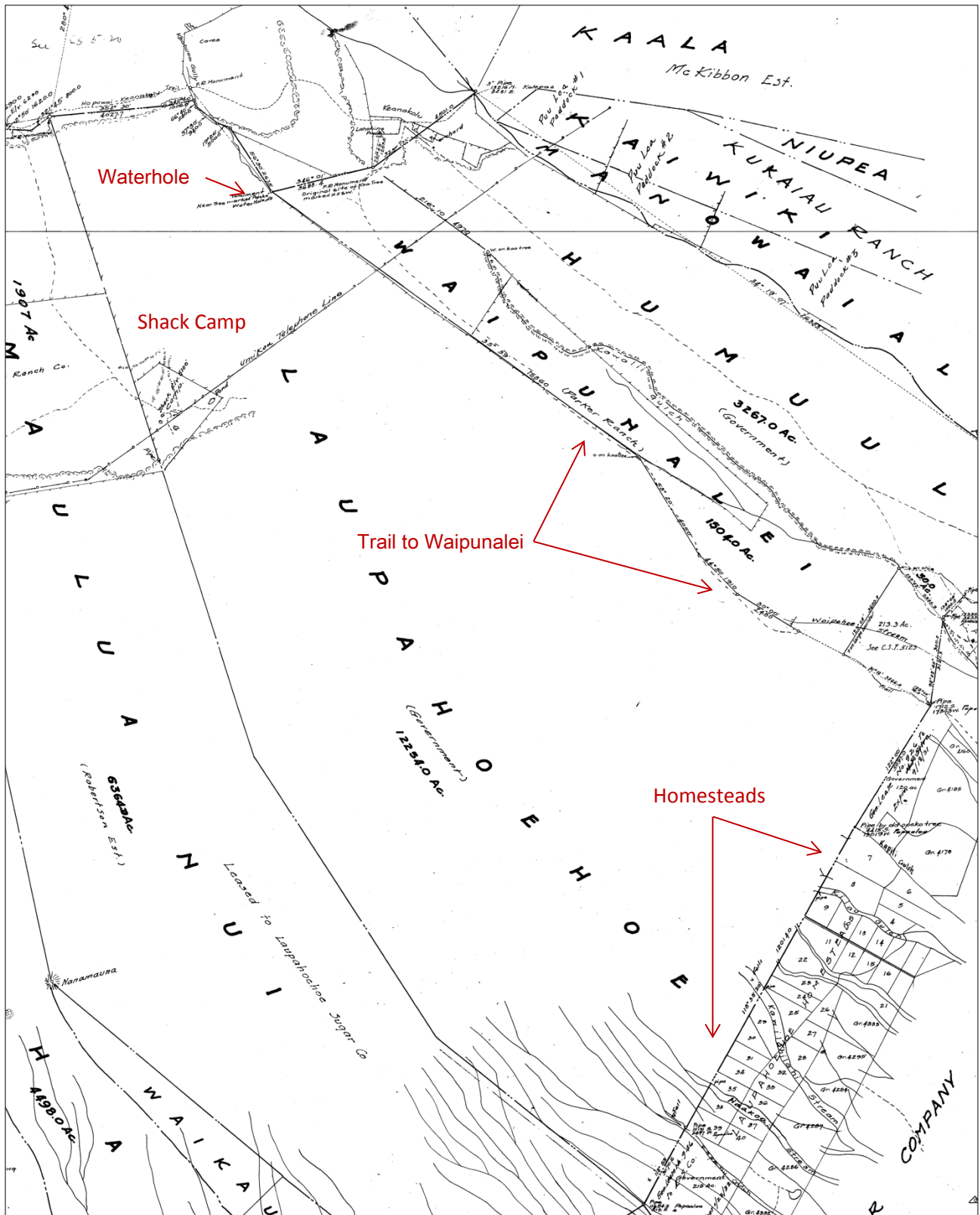


Figure 12: Laupāhoehoe Ahupua'a Extracted from 1921-1922 Hilo Forest Reserve Map (Reg. Map 2682). Depicted are Shack Camp, the Umikoa Telephone Line, waterhole at the mauka Waipunalei-Laupāhoehoe Boundary, what probably became the Waipunalei Trail, and Laupāhoehoe Homesteads.

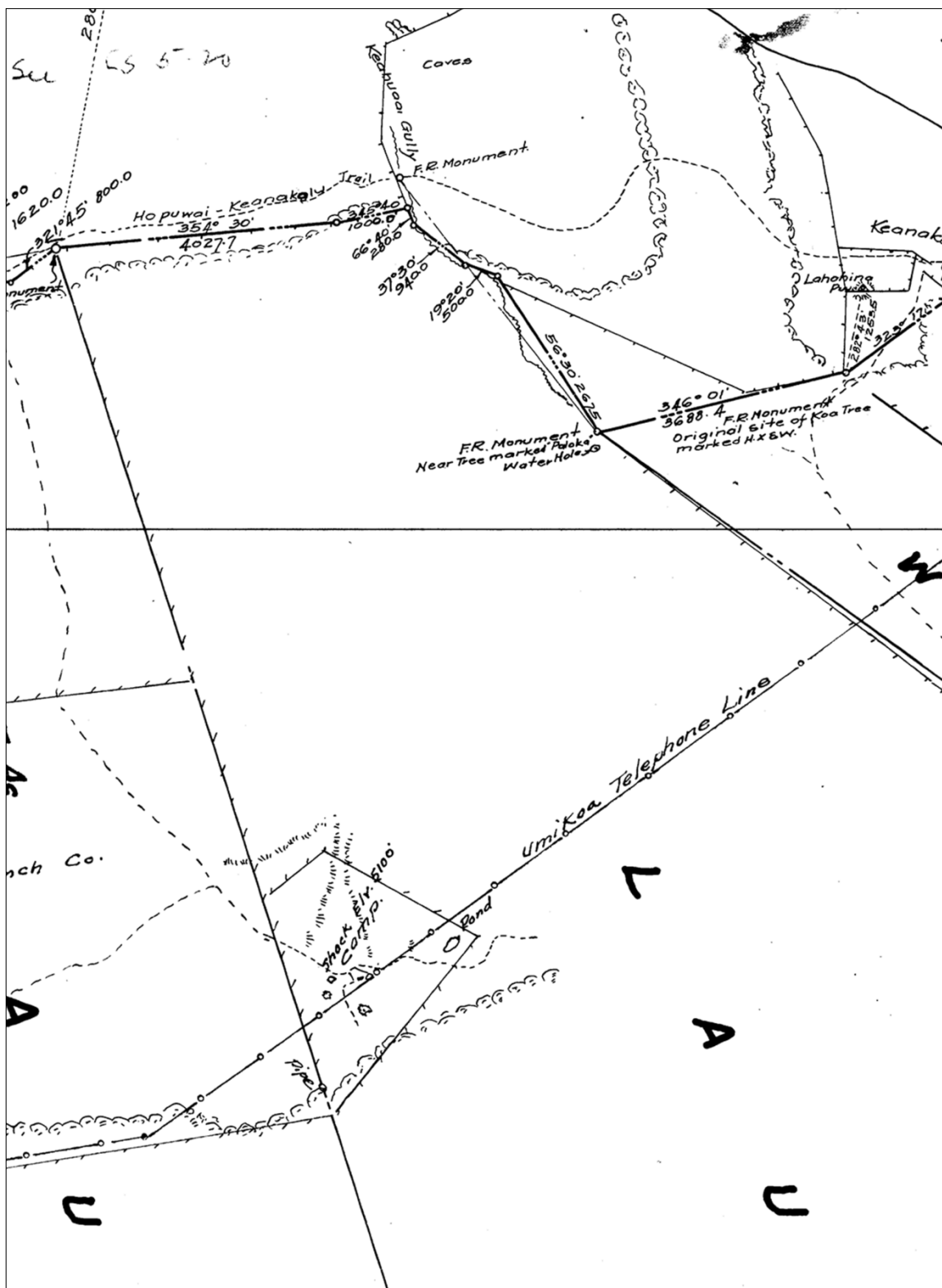


Figure 13: Shack Camp, Waterhole, and Umikoa Telephone Line on 1921-1922 Map of Upper Hilo Forest Reserve Boundaries (Reg. Map 2594).



Figure 14: Forest Understory and Ground Cover in Proposed Habitat Conservation Unit, Laupāhoehoe NAR. Blue flagging marks current maintenance trails in the NAR.



Figure 15: Post and Hog Wire Fencing Used to Protect Current Rare Plant Enclosures. The conservation unit fencing proposed in this project would be similar.



Figure 16: 'Auwai or Ditch Feature Near the Proposed Conservation Unit (View Facing East). The ditch is 0.80 m wide in this section.



Figure 17: Open Understory and Ground Cover in Planted Tropical Ash Stands. Identified remnants of the Maulua Trail are located within these stands as is the general route of the trail as shown on the USGS topographic map (Keanakolu Quad, 1982).



Figure 18: Understory and Ground Cover Vegetation in the Planted Tropical Ash Stands.

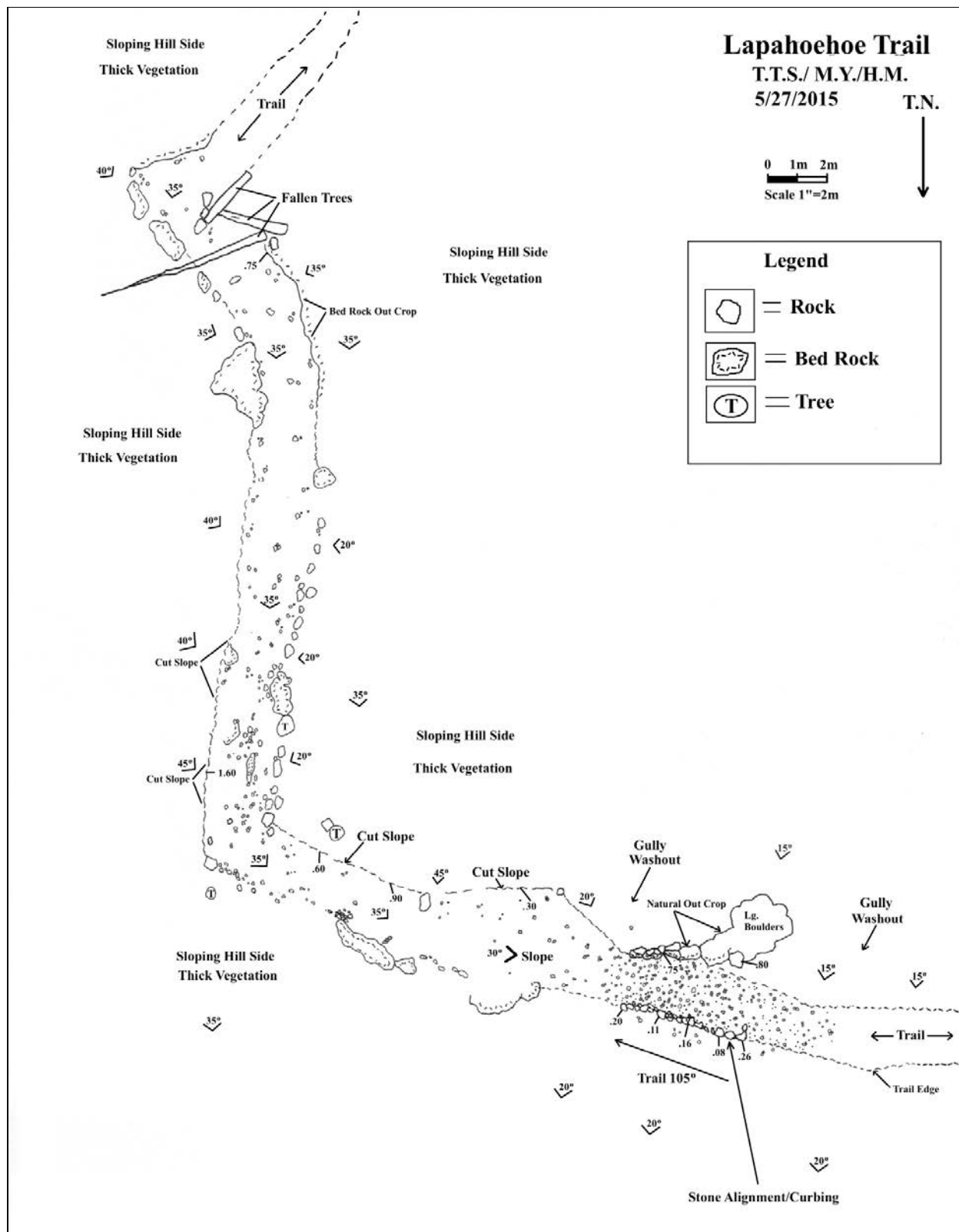


Figure 19: Mapped Remnant of Maulua Trail. This segment is 22 m (72 ft.) long (Map prepared by Tracy Tam Sing). Edges of the trail are defined intermittently by stone alignments and embankment cuts.



Figure 20: Trail Segment with Defined Curbstone Alignment. Beyond this segment is the start of a switchback that turns right after the incline visible in the photograph. An embankment cut defines the trail edge on the right hand side..



Figure 21: Upper Portion of Switchback. The trail grade was created by cutting the soil and rock embankment visible on the left and leveling what became the trail bed.



Figure 22: Notch Cut in Low Ridge for Maulua Trail Alignment. This was the second segment identified and recorded during the inspection.



Figure 23: Interior of Trail Notch Cut for Maulua Trail. The notch is roughly 2.1 m wide and the edge cut 1.16 m high.



Figure 24: Trail Cut in Low Rise to Create Trail Bed. This is the third identified and recorded segment.



Figure 25: Grinding Stone Located 20 m (65 ft.) West of the Third Recorded Maulua Trail Segment. The dense basalt slab was machine cut to create the grinding surface initially. It is 18 cm (7 in) long and 5 cm (2 in) thick.



Figure 26: Open Grass Areas and Identified Features of the Shack Camp Complex (Google Earth Image Dated 8-17-2013). Visible are the locations of the collapsed shack, the fruit tree orchard, and the pond.



Figure 27: Location of Pond Shown at Northern Extent of the Shack Camp Paddock on Historic Maps (View Facing Northwest). Water collects in the swale during rainy periods or heavy rains.



Figure 28: Grassy Field That Was Once the Open Pasture of the Shack Camp Paddock (View Facing South). Visible on the right is the bulldozed embankment of the former road cut.



Figure 29: Collapsed Roofing of Cattle Trough or Salt Lick (View Facing West). Note the height and density of the matted kikuyu grass and degree to which is obscures the ground surface.



Figure 30: Collapsed Structure of the Shack Camp Shack (View Facing West). The layout and construction of the shack is still recognizable, including the corrugated iron roofing, wooden board and batten walls, nails, and door.



Figure 31: Foundations of the Shack Camp Water Tank Located Adjacent to the Shelter.



Figure 32: Remnant Telephone Line Pole Located North of the Shelter. The location of this pole relative to the shelter is consistent with the line and pole placements shown on the 1921-1922 survey map (Reg. Map 2682, See Fig. 10).



Figure 33: Inspection Team Recording Collapsed Remains of the Shelter and Water Tank (View Facing West). Note the mix of blackberry bushes amongst the kikuyu grass hummocks.



Figure 34: Fruit Trees in Small Orchard Located on a Knoll Southeast of Shelter. Temperate climate timber species, mostly conifers, were also planted adjacent to the orchard and near the shelter.



Figure 35: Forest Reserve Territory of Hawaii (FRTH) Boundary Marker at Mauka Junction of Waipunalei and Laupāhoehoe Ahupua'a. The location this Forest Reserve Monument is shown on the 1916 and 1922 Maps of the Hilo Forest Reserve (Reg. Maps 2594 and 2682).



Figure 36: Possible Remnants of Pond Depicted at Junction of Mauka Junction Waipunalei and Laupāhoehoe Ahupua'a Boundaries in 1875, 1916, and 1921-1922 (Register Maps 667, 2594, and 2682). The pond feature is called a waterhole on the 1916 and 1922 Forest Reserve Maps. See Figures 7, 8, 10, 12, and 13.



Figure 37: Distinct Natural Rock Outcrop Next to Base of Very Large, Deteriorating Koa Tree. One of the stones with unusual surface patterns is located near the center of the photograph.



Figure 38: Stone in Natural Outcrop with Unusual Surface Patterns



Figure 39: Open Koa Canopy and Dense Kikuyu Grass Ground Cover in Inland-Most Forest Restoration Site (View Facing Northeast)



Figure 40: Large Patch 'Ākala (Hawaiian Raspberry) Forming a Dense Shrub Understory Component in Major Portions of the Inland-Most Forest Restoration Site (View Facing Southeast). Photograph was taken from the trail leading to the David Douglas Monument.



Figure 40: Plaque for Botanist David Douglas on Stone Monument Erected in His Honor. The plaque was placed on the side of the pillar facing the trail entry.



Figure 41: Rear Face of the Stone and Concrete Mortar Monument. Listed on the rear plaque are names Burns Society members responsible for erecting the monument in 1934.



Figure 42: Setting of David Douglas Monument on a Low Rise between a Ridge and Ravine.



Figure 43: View of David Douglas Monument from Ridge Slope (View Facing Southeast). The monument is visible through the branches on the left side of the photograph.

Appendix E: Laupāhoehoe Forest Management Plan

Also Available on-line at:

<http://dlnr.hawaii.gov/ecosystems/nars/hawaii-island/laupahoehoe-2/>